



# The Clark Fork Project FERC Project No. 2058

## 2025 Annual Report



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## Section 1: Introduction

### 1.1 Document Background and Purpose

Avista owns and operates the Noxon Rapids and Cabinet Gorge hydroelectric developments (HEDs), known collectively as the Clark Fork Project. Operation of the Clark Fork Project is conditioned by the Clark Fork Settlement Agreement (CFSA), signed in 1999 and the Federal Energy Regulatory Commission (FERC) License No. 2058 (License), effective March 1, 2001.

Article 402 of the License requires that Avista file an Annual Report on or before April 15, including a summary of the protection, mitigation, and enhancement (PM&E) measures implemented, funds expended, and resource benefits gained during the previous calendar year, as well as the annual implementation plans for PM&E measures proposed for the current calendar year. In the event the Management Committee (MC) identifies any unresolved issue with regard to the implementation of the CFSA, the Annual Report will include an explanation of such issues. In 2002, FERC granted Avista's request to submit the proposed annual implementation plans (AIP) for PM&E measures in a separate document on or before April 15.

In addition, the following License articles require annual reporting that are included as sections of Avista's Annual Report. The original submittal dates for annual reporting of these articles were modified after License issuance.

Article Number	Description	Revision Document
412	Water Quality Protection and Monitoring Plan	FERC Order No. P-2058-025
432	Threatened and Endangered Species Plan	Letter from USFWS (August 8, 2002)
433	Fishway Plan and Annual Report	Letter from USFWS (August 8, 2002)
442	Use and Occupancy of Project Lands and Waters	FERC Order No. P-2058-026, -031, & -032

### 1.2 Summary

This 2025 Annual Report documents the twenty-seventh consecutive year of implementation of the CFSA and twenty-fifth year of the License. In 2025, Avista implemented the terms and conditions of the CFSA in consultation with, and full approval of, the MC and the terms and conditions of the License. The MC is comprised of State and Federal agencies, non-governmental organizations, and five Native American Tribes (see Section 2). Avista, in consultation with members of the MC, continued to implement the current PM&E measures identified in the CFSA and the License. The MC, Terrestrial Resources Technical Advisory Committee (TRTAC), Water Resources Technical Advisory Committee (WRTAC), and Cultural Resources Management Group (CRMG) continued to meet in 2025.

Among the 21 PM&E measures, more than 80 projects and programs to benefit aquatic, terrestrial, historical, and cultural resources were implemented. The following paragraphs provide select highlights from the 2025 efforts.

Avista, through CFSA Appendix R, continued to work with Idaho and Montana State Historic Preservation offices, the U.S. Forest Service (USFS), and representatives from five Native American Indian tribes (Confederated Salish and Kootenai, Coeur d'Alene, Kootenai, and Kalispel), collectively referred to as the CRMG, to preserve and protect cultural and historic resources associated with the Clark Fork Project. In 2025, the Avista Cultural Resource Specialist and/or the CRMG reviewed 81 CFSA-related projects with proposed ground disturbance and/or projects related to the Noxon Rapids and Cabinet Gorge HEDs.



2025 Management Committee fall meeting.

At the fall MC meeting, Avista led a mini workshop focused on knowledge sharing with several founders of the CFSA, including both current and retired MC members. The session provided historical context on the lead-up to the CFSA signing, highlighted key issues at the time, and explored varying perspectives from different stakeholder groups. Participants were asked and answered important questions such as: What recommendations would you give the group today? What lessons were learned? What was the original concept for relicensing? A key insight was that the initial assumption was for the CFSA to carry forward into the next license and be re-signed during relicensing. Additionally, the discussion underscored that staff transitions at signatory organizations have been one of the greatest challenges to maintaining continuity over the years. Following the meeting, participants attended Lake Pend Orielle tours led by Idaho Department of Fish and Game (IDFG).



2025 Management Committee fall boat tour.

The Cabinet Gorge Fish Passage Facility (CGFPF) became operational in the summer of 2022. The attraction water that

flows through the facility to attract target fish into the trap originates in the forebay of Cabinet Gorge Dam. Water is siphoned from the forebay through two large pipes and controlled by valves located under the deck of the trap, close to where the water exits into the structure. During the first year of operation, significant pipe vibration was observed near the valves at higher siphon flows. This vibration has affected the integrity of siphon pipe supports and has led to multiple short-term shutdowns of the CGFPF.



CGFPF siphon pipe showing the flow control valve (orange) and pressure sensor installed for siphon vibration testing.

In 2025, Avista retained a contractor to evaluate the cause of vibration in the siphon pipe system and identify potential solutions. Field testing occurred in early November with the contractor installing equipment and recording information on vibration, strain, and

temperature in the siphon pipes near the valves. A final root cause analysis report with proposed solutions is expected in the spring of 2026.

Westslope Cutthroat Trout were initially transported upstream of Cabinet Gorge Dam in 2015 as part of an experimental transport program. This was the first time Westslope Cutthroat Trout had been moved past the dam since dam construction. Experimental transport continued annually through 2018 with fish radio tagged and their movements monitored to learn more about fish behavior following transport. Following 2018, Westslope Cutthroat Trout captured downstream of Cabinet Gorge Dam have



Adult Westslope Cutthroat Trout captured downstream of Cabinet Gorge Dam, transported to Montana in 2022, and recaptured and transported again in 2025.

been transported upstream annually. A total of 325 individuals have been transported to Montana, averaging 30 per year. To assess how successful these fish were at reproducing following transport a parentage study was implemented in 2022 and 2023. For this study, 863 fin tissue samples collected from Westslope Cutthroat Trout captured in tributaries in the Bull River Drainage were sent to a genetics lab for analysis. Parentage study results identified 17 offspring of transported Westslope Cutthroat Trout, produced by 12 different parents originating from four separate transport years. These findings indicate that at least a portion of transported adults successfully contributed to natural reproduction in the system, demonstrating measurable reproductive success following translocation.

The Walleye angler incentive program has been implemented since 2019 to financially incentivize anglers to harvest Walleye. This program rewards anglers that turn in Walleye heads via a raffle to win \$100 gift cards or a direct payment of \$1,000 for coded wire tagged Walleye. The angler incentive program in 2025 was highly successful with 4,842 Walleye removed by 531 unique



Angler receiving a \$1,000 reward for harvesting a Walleye that contained a coded wire tag from Lake Pend Oreille, Idaho.

monthly anglers, which is the greatest number of Walleye removed and angler participation in a single year since the program's inception. The high participation in the program in 2025 was likely due to a large cohort of age-2 Walleye in Lake Pend Oreille. Evidence suggests that the angler incentive program continues to be a successful program and is anticipated to continue in a similar manner in 2026.

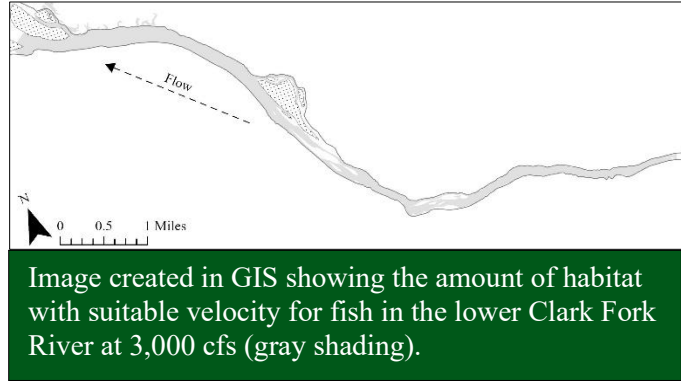
Streams in the lower Clark Fork River/Lake Pend Oreille watershed have been monitored for temperature as part of the CFSA since 1999. A database that houses this data was constructed in 2020. As part of the data collection process, temperature dataloggers are checked for calibration

before and after deployment and data are reviewed to ensure they meet data quality requirements. The temperature data is used to provide context for the results of fisheries monitoring around the

watershed. In 2025, 61 sites were monitored for temperature in association with eight CFSA project plans.

The lower Clark Fork River HEC-RAS model was completed in 2024. This model shows how velocity and river stage change with changes in Cabinet Gorge dam discharge. In 2025, the model was used to inform two reports funded by the CFSA. The first report titled “1999 through 2021 Lower Clark Fork River Salmonid

Abundance, Population Demographics, and Relative Abundance” used the model to help evaluate Mountain Whitefish growth in the lower Clark Fork River. The second report titled “Mapping the Potential for Fish to Compensate for Total Dissolved Gas in the Lower Clark Fork River” used the model to demonstrate where fish are most likely to be affected by elevated total dissolved gas (TDG) under spill conditions. This model will hopefully continue to be used to help understand fish habitat in the river and guide potential mitigation work.



Grouse Reach channel restoration construction.

Efforts to restore stream channel and floodplain function within the Vermilion River continued in 2025 with the implementation of the Grouse Reach channel and floodplain restoration project. The fourth such project enacted since 2012 involved the construction of over 2,000’ of complex and sinuous stream channel and improvements to over 10 acres of adjacent floodplain. This project adds to the over 4,400’ of previous projects, which represents a large-scale restoration for this important Bull Trout tributary. Design for this project, as well as contributions towards revegetation, was funded under CFSA Appendix B, while over \$400,000 in Federal

funds administered through the Lower Clark Fork Watershed Group (LCFWG) were used for construction.

Project monitoring for the Grouse Reach is conducted by the United States Geological Survey (USGS) and funded under CFSA Appendix B. Monitoring focuses on groundwater effects and basic productivity to inform future restoration efforts both at this site and across the western U.S. An encouraging result was the observation of five Bull Trout redds within the reconstructed Grouse Reach in October 2025.



Bull Trout redds within the Grouse Reach channel restoration area.



Fisheries working trailer at the East Fork Bull River tributary trapping site.

Fish trapping efforts for the East Fork Bull River under the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program began with the installation of fish traps at the start of September. New fish trap boxes were installed that utilized fish retention devices – clear plastic fingers shown to impede a trapped fish’s ability to escape back through the trap’s entrance cone. Also new for 2025 under this program was the procurement, outfitting, and deployment of the fisheries working trailer at the East Fork Bull River fish trapping site. This new equipment will allow for more efficient fish capture and the ability for staff to work-up fish in a secure, mobile, and out-of-the-weather environment.

First proposed in 2024, Avista worked with Montana Fish, Wildlife and Parks (MFWP) to develop a limited road system within the Tuscor Block Management Area (BMA) to provide improved access for hunters with mobility limitations. Most BMAs lack road systems suitable for hunters holding a Permit to Hunt From a Vehicle (PTHFV), making this a unique opportunity for an underserved user group. The road system allows vehicle access to areas that are otherwise difficult to reach, increases the potential for a successful hunt, and reduces off-road impacts by concentrating travel on maintained roads. Construction was completed prior to the 2025 general rifle season, and access is managed through an MFWP reservation system to avoid conflicts between PTHFV and on-foot hunters.



Newly cleared roads at Tuscor BMA.

A large amount of old wooded power poles had been previously stockpiled at the Twin Creek Day-Use Area, which is jointly operated by Avista and IDFG. A project was initiated to remove the power poles and remediate the area to prevent creosote preservative from leaching into the soil. Avista hired a contractor to remove and dispose of the poles in accordance with applicable regulations. The area will be allowed to regenerate with native vegetation.



Power poles and debris at Twin Creek prior to removal.



Area following debris removal.

To address prior tree clearing activities at Two Rivers RV Park and Campground, Avista proposed a project to clear remaining debris and stumps to improve the overall aesthetic of the campground, and to facilitate easier lawn maintenance. Additionally, the removal of the stumps would help to prevent damage to vehicles and travel trailers which may back into or over them. Stump grinding and debris removal was completed in November during the campground off-season.



Stump and debris prior to project.



Overview of campground following removal of debris and stumps.

A historic rain-on-snow event in mid-December brought substantial flooding to many of the tributaries to the lower Clark Fork River. Montana Governor Gianforte issued an executive order declaring a flooding disaster in northwestern Montana associated with the event. There were washouts of numerous roads and bridges in the region, the city of Libby struggled to deliver clean drinking water, and thousands of residents were without power for up to a week.

Lightning Creek in Idaho is the only tributary to the lower Clark Fork River downstream of Prospect Creek with a real-time streamflow gage. Discharge in Lightning Creek peaked at around 14,500 cfs marking the second highest observed discharge since the gage was installed in 1989.

The Bull River Drainage also experienced significant flooding; however, streamflow data are not presently available.

Thankfully, effects to resources associated with implementation of the CFSA were minimally impacted. There was damage to some of the passive integrated transponder (PIT)-monitoring stations in various streams that have yet to be thoroughly assessed. However, most systems are still largely operational. The largest potential impact could be to Bull Trout production in area streams. It is possible that in-gravel survival of incubating Bull Trout embryos was low due to scour or entombment through the deposition of fine sediments. To understand these effects, we will have to wait until 2027 relative abundance monitoring when Bull Trout are effectively sampled through electrofishing.



Runoff due to the December rain-on-snow event in the Bull River.



Effects of the December rain-on-snow flooding on Lightning Creek.

### 1.3 Acronyms and Abbreviations

AIP	Annual Implementation Plan
AIS	Aquatic Invasive Species
BNSF	Burlington Norther Santa Fe
CFSA	Clark Fork Settlement Agreement
CGDF <i>or</i> CGFPF	Cabinet Gorge Fish Passage Facility
CGH	Cabinet Gorge Hatchery
CRMG	Cultural Resources Management Group
EWM	Eurasian Watermilfoil
FRD	Fish Retention Device
FERC	Federal Energy Regulatory Commission
GBD	Gas Bubble Disease
GDP	Gross Domestic Product
HED	hydroelectric development
IDFG	Idaho Department of Fish and Game
KNRD	Kalispel Tribe Natural Resources Department
LCFWG	Lower Clark Fork Watershed Group
LPO	Lake Pend Oreille
LUMP	Land Use Management Plan
MC	Management Committee
M&E	Monitoring and Evaluation
MFWP	Montana Fish, Wildlife and Parks
NFWF	National Fish and Wildlife Foundation
NSRP	Native Salmonid Restoration Plan
PIT	passive integrated transponder
PM&E	protection, mitigation, and enhancement
PRWG	Priest River Watershed Group
RPMs	Reasonable and Prudent Measures
RRMP	Recreation Resource Management Plan
TDG	total dissolved gas
TRTAC	Terrestrial Resources Technical Advisory Committee
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
WDFW	Washington Department of Fish and Wildlife
WRTAC	Water Resources Technical Advisory Committee
Y2Y	Yellowstone to Yukon

## Section 2: Management Committee

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### 2.1 Purpose

Paragraph 26 of the CFSA established a MC composed of representatives from each of the CFSA signatories. The MC oversees all PM&E measures. The MC shall have the authority, subject to such FERC approvals as may be necessary in appropriate cases, to:

- Approve plans developed by Avista and the appropriate technical committee for the implementation of PM&E measures, including the related funding;
- Approve modifications of PM&E measures;
- Oversee the implementation of all PM&E measures by Avista and the appropriate committees;
- Establish such committees as it deems necessary for the purpose of implementing the CFSA and PM&E measures, and determine, as appropriate, the size, membership, and procedures of such committees;
- Establish appropriate procedures for conducting its activities, including procedures for proxy voting and teleconferencing methods;
- Permit additional entities to execute the CFSA and thereby become parties to the CFSA (Parties) and, as appropriate, permit the addition of such new Parties on terms different from those of the original signatories to the CFSA;
- Resolve all disputes regarding implementation of approved PM&E measures and all disputes brought to it for resolution by any of the Parties or committees;
- Amend the CFSA including the PM&E measures, in accordance with the voting provisions set forth in the CFSA.

### 2.2 List of Representatives

In 2025, 23 of the 27 Parties of the CFSA had designated MC representatives. Representatives are verified bi-annually through the sign-in sheet distributed at each MC meeting. The 2025 MC representatives are listed below:

Avista	Monica Ott
Bull River Watershed Council	Tom McDowell
Cabinet Resource Group	Jim Nash
Coeur d'Alene Tribe	Caj Matheson
Confederated Salish and Kootenai Tribes	Les Evarts
Green Mountain Conservation District	Terry Hightower
Idaho Department of Environmental Quality	Bob Steed
Idaho Department of Fish and Game	Carson Watkins
Idaho Rivers United	Kevin Lewis
Kalispel Tribe	Joe Maroney
Kootenai Tribe of Idaho	Shawn Young
Lake Pend Oreille Idaho Club	Carter Sandhal
Montana Bass Federation	Bob Beberg

Montana Department of Environmental Quality	Keenan Storrar
Montana Department of Natural Resources and Conservation	Valerie Kurth
Montana Fish, Wildlife and Parks	Amber Steed
Montana State Historic Preservation Office	Jessica Bush
Noxon-Cabinet Shoreline Coalition	Rick Robinson
Panhandle Chapter Trout Unlimited	Chip Corsi
Rock Creek Alliance	Diane Williams
Sanders County, Montana	Tony Cox
U.S. Fish and Wildlife Service	Ben Conard
U.S. Forest Service	Michael Feiger

Management Committee representatives not designated in 2025:

Alliance for the Wild Rockies  
 Elk Creek Watershed Council  
 Idaho Department of Parks and Recreation  
 Idaho State Historic Preservation Office

### **2.3 Meeting and Activity Summary**

In 2025 the MC again conducted business utilizing in-person meetings with a virtual option to meet the requirements of Paragraph 28 of the CFSA. These represented the 61<sup>st</sup> and 62<sup>nd</sup> meetings of this group since the signing of the CFSA. The first meeting of 2025 consisted of sending all members copies of the 2025 AIPs and holding a meeting on March 11, 2025. Through this process all 2025 AIPs were approved as presented by consensus. The MC also reviewed the 2024 Annual Report and approved the budget sheet.

The second meeting of the MC was held in-person on September 23, 2025 and provided updates on the implementation of the 2025 AIPs. The MC reviewed one Avista-held parcel purchased through the CFSA, and approved by consensus maintaining the ownership status quo for the next five years, recognizing that any action requires MC review and approval. On September 24, 2025, IDFG led MC members on a boat tour of CFSA projects and fisheries sites on and around Lake Pend Oreille.

All meetings were open to the public, meeting information was placed on Avista’s Clark Fork Project website, and notices were placed in the local newspaper. The AIPs and project updates were provided to the MC and anyone that requested them.

#### **2.3.1 2025 Consent Mails**

Throughout 2025, the MC reviewed and approved one Consent Mail received through the request process established by the Clark Fork Management Committee Procedures. Consent Mail requests are a business process utilized for decision making between MC meetings. Proposals that are approved move forward, while those that are not approved are discussed at the next regularly scheduled MC meeting. The following proposal was received by Consent Mail, and approved:

- July 10, 2025 request for approval of Appendix B – Stimson Conservation Easement

(CFSA Appendix B; approved on July 28, 2025).

## **2.4 Key 2025 References**

Avista. 2025. Consent Mail approval of Appendix B – Stimson Conservation Easement (July 28, 2025). Avista document identification number 2025-0148.

Avista. 2025. Public webpage for the Clark Fork Project. <https://www.myavista.com/about-us/celebrate-our-rivers/federal-licensing> (December 2025).

Avista. 2025. Clark Fork Settlement Agreement Management Committee Meeting Record from March 11, 2025. Avista document identification number 2025-0263.

Avista. 2025. Clark Fork Settlement Agreement Management Committee Meeting Record from September 23, 2025. Avista document identification number 2025-0264.

## Section 3: Water Resources Technical Advisory Committee

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### 3.1 Purpose

The WRTAC is one of two technical advisory committees designated by Paragraph 32 of the CFSA. The WRTAC provides technical review of water-related PM&E measures (Section 3.2), including those dealing with fishery resources, water quality, and water quantity. The WRTAC is consulted in the development of appropriate implementation plans for water resources PM&E measures and related funding recommendations.

### 3.2 Water Related PM&E Measures

PM&E Measure	CFSA Appendix	Clark Fork License Article
Idaho Tributary Habitat Acquisition and Fishery Enhancement Program	A	404
Montana Tributary Habitat Acquisition and Recreational Fishery Enhancement Program	B	405
Fish Passage/Native Salmonid Restoration Plan	C	406
Bull Trout Protection and Public Education Project	D	407
Watershed Councils Program	E	408
Clark Fork River Water Quality Monitoring Program	F1	409
Aquatic Organism Tissue Analysis	F3	411
Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities	F4	412
Dissolved Gas Supersaturation Control, Mitigation, and Monitoring	F5	413
Project Operations Package	T	429/430/431

### 3.3 List of Representatives

The WRTAC consists of representatives appointed by MC members. The 2025 representatives are listed below:

Avista	Eric Oldenburg
Cabinet Resource Group	Kim Matthew
Coeur d'Alene Tribe	Caj Matheson
Confederated Salish and Kootenai Tribes	Craig Barfoot
Green Mountain Conservation District	Bill Naegeli
Idaho Department of Environmental Quality	Bob Steed
Idaho Department of Fish and Game	Rob Ryan
Kalispel Tribe	Jason Olson
Kootenai Tribe of Idaho	Nate Jensen
Lake Pend Oreille Idaho Club	David Gillespie

Montana Department of Environmental Quality	Keenan Storrar
Montana Department of Fish, Wildlife and Parks	Jason Blakney
Montana Department of Natural Resources and Conservation	Valerie Kurth
Montana State Historic Preservation Office	Jessica Bush
Noxon-Cabinet Shoreline Coalition	Rick Robinson
Panhandle Chapter Trout Unlimited	Bill Love
Rock Creek Alliance	Diane Williams
U.S. Fish and Wildlife Service	Carter Fredenberg
U.S. Forest Service	Megan Mellott

The following parties to the CFSA did not designate WRTAC representatives in 2025:

Alliance for the Wild Rockies  
 Bull River Watershed Council  
 Elk Creek Watershed Council  
 Idaho Department of Parks and Recreation  
 Idaho Rivers United  
 Idaho State Historic Preservation Office  
 Montana Bass Federation  
 Sanders County, Montana

### **3.4 Meeting and Activity Summary**

The WRTAC met twice in 2025, on January 22 and August 26. Both meetings were conducted in-person with virtual attendance offered. Notices of the meetings were placed in the local newspaper and posted on Avista’s Clark Fork Project website. In addition, project proponents initially ranked eligible projects which were reviewed by the Aquatic Implementation Team and recommended scores were provided to the WRTAC, which were discussed and ratified during the January 22 meeting.

### **3.5 Key 2025 References**

- Avista. 2025. Water Resources Technical Advisory Committee Meeting Packet from January 22, 2025. Avista document identification number 2025-0085.
- Avista. 2025. Water Resources Technical Advisory Committee Meeting Packet from August 26, 2025. Avista document identification number 2025-0238.
- Avista. 2025. Public webpage for the Clark Fork Project. <https://www.myavista.com/about-us/celebrate-our-rivers/federal-licensing> (December 2025).

## Section 4: Terrestrial Resources Technical Advisory Committee

### 4.1 Purpose

The TRTAC is one of two technical advisory committees designated by Paragraph 32 of the CFSA. The TRTAC provides technical review of terrestrial-related PM&E measures (see Section 4.2), including those dealing with wildlife, botanical resources, wetlands, land use, recreation, and aesthetics. The TRTAC is consulted in the development of appropriate implementation plans for terrestrial resource PM&E measures and related funding recommendations.

### 4.2 Terrestrial Related PM&E Measures

PM&E Measures	CFSA Appendix	Clark Fork License Article
Implementation of the Land Use Management Plan	G	414
Implementation of the Recreation Resource Management Plan	H	415
Implementation of the Aesthetics Management Plan	I	416
Development and Implementation of Wildlife, Botanical, and Wetland Management Plan	J	417
Wildlife Habitat Acquisition, Enhancement, and Management Program	K	418
Black Cottonwood Habitat Protection and Enhancement	L	419
Wetlands Protection and Enhancement Program	M	420
Forest Habitat Protection and Enhancement	P	425
Reservoir Islands Protection	Q	426
Erosion Fund and Shoreline Stabilization Guidelines Program	S	428

### 4.3 List of Representatives

The TRTAC consists of representatives appointed by MC members. The 2025 representatives are listed below:

Avista	Arthur Potts
Bull River Watershed Council	Tom McDowell
Cabinet Resource Group	Rob Kjos
Coeur d'Alene Tribe	Caj Matheson
Elk Creek Watershed Council	Judy Hutchins
Green Mountain Conservation District	Bill Naegeli
Idaho Department of Environmental Quality	Bob Steed
Idaho Department of Fish and Game	Rob Ryan
Kalispel Tribe	Ray Entz
Kootenai Tribe of Idaho	Cambell Olson
Montana Bass Federation	Bob Beberg
Montana Department of Environmental Quality	Craig Jones

Montana Fish, Wildlife and Parks  
Montana State Historic Preservation Office  
Noxon-Cabinet Shoreline Coalition  
Rock Creek Alliance  
Sanders County, Montana  
U.S. Fish and Wildlife Service  
U.S. Forest Service

Tony Powell  
Jessica Bush  
Rick Robinson  
Mary Costello  
Tony Cox  
Wayne Kasworm  
Caleb Matthew

The following parties to the CFSA did not designate TRTAC representatives in 2025:

Alliance for the Wild Rockies  
Confederated Salish and Kootenai Tribes  
Idaho Department of Parks and Recreation  
Idaho Rivers United  
Idaho State Historic Preservation Office  
Lake Pend Oreille Idaho Club  
Montana Department of Natural Resources and Conservation  
Panhandle Chapter Trout Unlimited

#### **4.4 Meeting and Activity Summary**

The TRTAC met twice in 2025, on January 21 and August 27. Both meetings were hybrid with both in-person and virtual options. Notices of these meetings were placed in the local newspaper and posted on Avista’s Clark Fork Project website. At the January meeting the TRTAC discussed the 2025 AIPs and provided recommendations for the MC. The August meeting consisted of project updates for the 2025 project plans.

#### **4.5 Key 2025 References**

Avista. 2025. Terrestrial Resources Technical Advisory Committee Meeting Packet from January 21, 2025. Avista document identification number. 2025-0240.

Avista. 2025. Terrestrial Resources Technical Advisory Committee Meeting Packet from August 27, 2025. Avista document identification number 2025-0239.

Avista. 2025. Public webpage for the Clark Fork Project. <https://www.myavista.com/about-us/celebrate-our-rivers/federal-licensing> (December 2025).

## Section 5: Cultural Resources Management Group (License Article 427 – CFSA Appendix R)

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### 5.1 Purpose and Resource Benefit

The CRMG was formed in support of CFSA Appendix R (Clark Fork Heritage Resource Program). Appendix R of the CFSA corresponds to Article 427 in the FERC License for Clark Fork Project No. 2058.

The CRMG consists of representatives from Coeur d’Alene, Kootenai, Confederated Salish and Kootenai, Kalispel Tribes, Idaho and Montana State Historic Preservation offices, USFS, and Avista. Individual representatives of each tribe and agency may vary from meeting to meeting. Due to confidentiality requirements, these meetings are not open to the public. The CRMG reviews all ground-disturbing activities that may impact cultural or historic resources and uses the Clark Fork Heritage Resource Management Plan (Plan) to guide implementation of management efforts.

The purpose of CFSA Appendix R is to provide directives for all eligible properties associated with the Clark Fork Project, including dam sites, homesteading-era properties, pre-historic properties, and sites with traditional cultural significance. The Plan helps to support many of the projects in other CFSA PM&E measures. It also helps to ensure that historic properties are protected and managed. The Plan is intended to extend beyond a mere “treatment plan” and provides the flexibility to be useful to a variety of audiences. The Plan includes public education goals, objectives, and action strategies as important focuses.

### 5.2 Meeting and Activity Summary

On February 27, 2025, the CRMG met to discuss the 2024 activities and 2025 AIPs for aquatic and terrestrial resources, proposed ground disturbances at recreation sites, various land use permits, and annual monitoring results. Meeting attendees included the Confederated Salish and Kootenai Tribes, Coeur d’Alene Tribe, USFS Kootenai National Forest, Montana and Idaho State Historic Preservation Offices, and Avista.

The fall CRMG meeting placeholder was cancelled, with group consensus, since all projects and monitoring were going as planned.

### 5.3 2025 Annual Implementation Plan Project Plan

- Clark Fork Heritage Resource Program
  - *Completed per 2025 AIP*<sup>1,2</sup>

#### 5.3.1 Other 2025 Activities

- Other projects not specifically tied to aquatic or terrestrial PM&E measures reviewed by the Avista Cultural Resource Specialist and/or the CRMG include:
  - Maintenance projects for Noxon Rapids and Cabinet Gorge dams and associated facilities.

### **5.3.2 Projects with Significant Variances**

- No significant variances to report.

### **5.4 Key 2025 References**

<sup>1</sup> Johnson, L. 2025. Appendix R Clark Fork Heritage Resource Program. 2025 Annual Work Summary. Avista document identification number 2025-0288.

<sup>2</sup> Avista. 2024. CRMG Meeting Summary (Public Version) from February 29, 2024. Avista document identification number 2024-0343.

## Section 6: Water Resources PM&E Measures Implementation Efforts

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### 6.1 Idaho Tributary Habitat Acquisition and Fishery Enhancement Program (License Article 404 – CFSA Appendix A)

#### 6.1.1 Purpose and Resource Benefit

The purpose of this program is to offset the power peaking impacts of the Cabinet Gorge Development to native salmonid species (i.e., Bull Trout, Westslope Cutthroat Trout, and Mountain Whitefish). Resource benefits are accomplished through watershed restoration and enhancement, fishery monitoring and management support, and a public education and enforcement initiative focused on Bull Trout in Idaho.

#### 6.1.2 2025 Annual Implementation Plan Project Plans

##### *Tributary Habitat Acquisition and Enhancement*

- Habitat Restoration Scoping Allocation
  - *Completed per 2025 AIP*<sup>1</sup>
- Habitat Restoration and Acquired Property Maintenance and Monitoring Allocation
  - *Variance*<sup>1,2</sup>; see Section 6.1.4
- Priority Native Salmonid Habitat Acquisition and Conservation Allocation
  - *Completed per 2025 AIP*<sup>1</sup>
- Idaho Field Station Operation and Maintenance
  - *Completed per 2025 AIP*<sup>1</sup>
- Pack River Watershed Management Plan Addendum
  - *Variance*<sup>1</sup>; see Section 6.1.4
- Rattle Creek Habitat Enhancement Project Monitoring
  - *Completed per 2025 AIP*<sup>1,3,4</sup>
- Grouse Creek Stream Channel Restoration Project
  - *Variance*<sup>1</sup>; see Section 6.1.4

##### *Fishery Resource Monitoring, Enhancement, and Management*

- Fish Resource Monitoring, Enhancement, and Management Plan
  - *Variance*<sup>1,4,5,6,7</sup>; see Section 6.1.4

### 6.1.3 Other 2025 Activities

- No other activities to report.

### 6.1.4 Projects with Significant Variances

Project Plan	Variances
<b>Habitat Restoration and Acquired Property Maintenance and Monitoring Allocation</b>	Several properties were not treated in 2025 due to IDFG personnel vacancies that limited available time.
<b>Pack River Watershed Management Plan Addendum</b>	A draft Pack River Native Salmonid Habitat Restoration Plan was submitted to Avista and IDFG on November 1, 2025. The plan is pending review from Avista and IDFG and the Pack River Technical Advisory Committee. The plan is anticipated to be completed in 2026.
<b>Grouse Creek Stream Channel Restoration Project</b>	The project was delayed because of contractor availability in 2025. This resulted in a delay in permits being issued. All aspects of the project have been rescheduled, and implementation of the project is anticipated in 2026 with all reporting dates adjusted accordingly.
<b>Fish Resource Monitoring, Enhancement, and Management Plan</b>	Fish monitoring at one site on East Fork Lightning Creek and one site on Rattle Creek were not completed due to wildfire-related closures on USFS lands in the Lightning Creek basin.

### 6.1.5 Key 2025 References

- <sup>1</sup> Ryan, R. 2025. Appendix A Idaho Tributary Habitat Acquisition and Fishery Enhancement Program. 2025 Annual Work Summary. Avista document identification number 2025-0282.
- <sup>2</sup> Avista. 2025. Pesticide/Herbicide Application Summary for Clark Fork Project 2025. Avista document identification number 2025-0266.
- <sup>3</sup> RivHab. 2025. Rattle Creek Monitoring Report Instream Wood Enhancement Project. Report to Avista. Avista document identification number 2025-0276.
- <sup>4</sup> Avista. Database for Temperature Monitoring Data Compilation; for more information on this database contact Paul Kusnierz ([Paul.Kusnierz@avistacorp.com](mailto:Paul.Kusnierz@avistacorp.com)).
- <sup>5</sup> Birdsall, B. 2025. Idaho Tributary Monitoring. 2024 Annual Project Update. Avista document identification number 2025-0039.
- <sup>6</sup> Birdsall, B., M. Woodruff, and R. Jakubowski. 2025. 2009–2023 Idaho Tributary Monitoring.

Comprehensive Project Report. Avista document identification number 2025-0040.

<sup>7</sup> Jakubowski, R., and B. Birdsall. 2025. Pend Oreille Basin Bull Trout Redd Monitoring. 2024 Annual Project Update. Avista document identification number 2025-0047.

## 6.2 Montana Tributary Habitat Acquisition and Recreational Fishery Enhancement Program (License Article 405 – CFSA Appendix B)

### 6.2.1 Purpose and Resource Benefit

The purpose of this program is to offset the impacts of the power peaking and reservoir operational impacts of the Clark Fork Project to native salmonids and recreational fisheries in Montana. This is achieved through a multiple-component program that includes the restoration and enhancement of Clark Fork River tributary watersheds, support of recreational fishery monitoring and management, and evaluation and implementation of recreational fishery enhancement projects. These programmatic efforts benefit tributary habitats within the project area and the native salmonid and recreational fisheries associated with them.

### 6.2.2 2025 Annual Implementation Plan Project Plans

#### *Tributary Habitat Acquisition and Enhancement*

- Habitat Restoration Monitoring and Native Salmonid Abundance Monitoring Plan
  - *Variance*<sup>1,2</sup>; see Section 6.2.4
- Redd Surveys in Montana Tributaries
  - *Variance*<sup>1,3</sup>; see Section 6.2.4
- Stream Gage Monitoring
  - *Variance*<sup>1</sup>; see Section 6.2.4
- Crow Creek Bull Trout Investigation
  - *Completed per 2025 AIP*<sup>1,4</sup>
- Lower Clark Fork Watershed Group Project Coordination
  - *Variance*<sup>1,5</sup>; see Section 6.2.4
- Habitat Restoration Monitoring, Maintenance, and Contingency Allocation
  - *Completed per 2025 AIP*<sup>1</sup>
- Habitat Restoration, Property Acquisition, and Conservation Easement Contingency Allocation
  - *Completed per 2025 AIP*<sup>1</sup>
- Prospect Creek Bull Trout Salvage Evaluation
  - *Variance*<sup>1</sup>; see Section 6.2.4
- St. Paul Trailhead Improvement Project
  - *Variance*<sup>1,6</sup>; see Section 6.2.4
- Lower Clark Fork Bull Trout Life History Evaluation
  - *Completed per 2025 AIP*<sup>1</sup>

- Monitoring Effectiveness of the Vermilion River Restoration
  - *Variance*<sup>1,7</sup>; see Section 6.2.4

***Recreational Fishery Enhancement***

- Cabinet Gorge and Noxon Reservoir Fisheries Monitoring Plan
  - *Completed per 2025 AIP*<sup>1,2,8</sup>
- Mountain Lake Fisheries Monitoring Project
  - *Variance*<sup>1</sup>; see Section 6.2.4
- Lower Bull River Day Use Boat Access Site Operation
  - *Completed per 2025 AIP*<sup>1,9</sup>
- Noxon Reservoir Boat Ramp Improvements
  - *Variance*<sup>1,10</sup>; see Section 6.2.4
- Managing Aquatic Invasive Plants on Noxon and Cabinet Gorge Reservoirs
  - *Completed per 2025 AIP*<sup>1,11</sup>
- Dreissenid Mussel Sampling on Noxon and Cabinet Gorge Reservoirs
  - *Completed per 2025 AIP*<sup>1,12</sup>
- Noxon Reservoir Bathymetry Update
  - *Variance*<sup>1,13</sup>; see Section 6.2.4
- Cabinet Gorge Reservoir Bathymetry Update
  - *Completed per 2025 AIP*<sup>1</sup>

**6.2.3 Other 2025 Activities**

- July 10, 2025 request for approval of Appendix B – Stimson Conservation Easement (CFSA Appendix B; approved on July 28, 2025).
  - *Completed per Consent Mail*<sup>1,14</sup>

**6.2.4 Projects with Significant Variances**

Project Plan	Variances
<b>Habitat Restoration Monitoring and Native Salmonid Abundance Monitoring Plan</b>	<p>Monitoring did not occur in Copper Creek (due to denied access), Graves Creek (deemed unnecessary due to recent monitoring), and two sites in the Vermilion River (due to stream restoration activities); sampling of these sites is anticipated in the coming years.</p> <p>The Annual Project Update Report for 2024 activities was not completed by November 15, 2025. The report is anticipated to be completed in 2026.</p>

Project Plan	Variances
<b>Redd Surveys in Montana Tributaries</b>	<p>Staffing constraints, exacerbated by the shutdown of the Federal Government, an active wildfire, and historically low streamflow, precluded surveys of Rock Creek and complete surveys of the Bull River and East Fork Bull River Index Reaches. These streams and/or reaches will be surveyed in the future as scheduled.</p> <p>High streamflow precluded identification and sampling of Brown Trout redds in the East Fork Bull River.</p>
<b>Stream Gage Monitoring</b>	<p>No Collection Agreement was executed in 2025. Data from Kootenai National Forest has not yet been received, and Water-Year report production is uncertain due to federal staffing reductions. Future hydrological data may be obtained through a private contractor.</p>
<b>Lower Clark Fork Watershed Group Project Coordination</b>	<p>The GIS database/Google Earth file and/or an ArcGIS Story Map was not completed in 2025 due to the resignation of the Lower Clark Fork Watershed Group Coordinator. Project locator maps were included in the Comprehensive Report. Due to the production of these report maps and the technical expertise required to produce the more detailed complimentary maps and ArcGIS Story Map work products, completion of these components has been suspended. If deemed necessary in the future, these map work products would be proposed as a separate work product in a future Project Plan.</p>
<b>Prospect Creek Bull Trout Salvage Evaluation</b>	<p>The University of Montana Conservation Genetics Laboratory Report for 2024 was postponed in order to include all genetic tissue collected in 2024 and 2025. The report is anticipated to be completed in 2026.</p>
<b>St. Paul Trailhead Improvement Project</b>	<p>Funding for this project had been secured through the Legacy Roads and Trails Act. The Kootenai National Forest informed Avista and MFWP in July 2025 that the funding had been reassigned, and implementation would not occur in 2025.</p>
<b>Monitoring Effectiveness of the Vermilion River Restoration</b>	<p>Some planned field activities were reduced in 2025 based on 2024 data and allocation of funds to prepare a Project Completion Report. Water-quality sampling was performed at fewer sites in 2025 because 2024 results showed negligible differences between sites, and sampling occurred later than was planned.</p>
<b>Mountain Lake Fisheries Monitoring Project</b>	<p>The Comprehensive Project Report was not completed by MFWP on December 31, 2025. The report is anticipated to be completed in 2026.</p>
<b>Noxon Reservoir Boat Ramp Improvements</b>	<p>The total cost of gate fabrication and installation exceeded the approved budget by \$2,345.</p>
<b>Noxon Reservoir Bathymetry Update</b>	<p>Finalization of the map has been intentionally delayed for efficiencies related to completing this and the Cabinet Gorge Bathymetric maps simultaneously.</p>

## 6.2.5 Key 2025 References

- <sup>1</sup> Rehm, T. 2025. Appendix B Montana Tributary Habitat Acquisition and Recreational Fishery Enhancement Program. 2025 Annual Work Summary. Avista document identification number 2025-0286.
- <sup>2</sup> Avista. Database for Temperature Monitoring Data Compilation; for more information on this database contact Paul Kusnierz ([Paul.Kusnierz@avistacorp.com](mailto:Paul.Kusnierz@avistacorp.com)).
- <sup>3</sup> Moran, S. 2025. Lower Clark Fork River, Montana – Avista Project Area – 2024 Annual Bull Trout and Brown Trout Redd Survey. 2024 Annual Project Update. Avista document identification number 2025-0134.
- <sup>4</sup> Blakney, J., A. Maddigan, L. Lambert, T. Tholl, J. Dukovic, M. Terrazas. 2025. A comparison of habitat and its influence on native trout in neighboring headwater streams in the lower Clark Fork River drainage, Montana, including Bull Trout habitat suitability evaluation in Crow Creek. Project Completion Report. Avista document identification number 2025-0188.
- <sup>5</sup> Moran, S. and S. Poiesz. 2025. Lower Clark Fork Stream Restoration Summary – Update 1995–2024. Comprehensive Project Report. Avista document identification number 2025-0214.
- <sup>6</sup> RivHab. 2025. U.S. Forest Service and Avista St. Paul Trailhead Relocation Sanders County, Montana. Avista document identification number 2025-0220.
- <sup>7</sup> U. S. Geological Survey (USGS). 2025. Public webpage for monitoring effectiveness of Vermilion River restoration. <https://www.usgs.gov/wyoming-montana-water-science-center/science/restoration-effectiveness-monitoring-vermilion> (December 2025).
- <sup>8</sup> Rehm, T., A. Mueller, J. Blakney, and T. Tholl. 2025. Cabinet Gorge and Noxon Reservoir Fisheries Monitoring. 2024 Annual Project Update. Avista document identification number 2025-0109.
- <sup>9</sup> Pinnacle Research and Consulting. 2025. 2025 Clark Fork Recreation Site Visitation Noxon Rapids and Cabinet Gorge Hydroelectric Projects. Avista document identification number 2025-0246.
- <sup>10</sup> Powell, T. 2025. Thompson Falls State Park early season boat ramp access plan of action as amended in 2025 for access gating installation. Avista document identification number 2025-0136.
- <sup>11</sup> Sanders County Aquatic Invasive Plants Task Force. 2025. Aquatic invasive plant management plan. Avista document identification number 2025-0232.
- <sup>12</sup> Kusnierz, P. 2025. 2025 Dreissenid Mussel Sampling on Noxon and Cabinet Gorge

Reservoirs. Memorandum. Avista document identification number 2025-0184.

<sup>13</sup> Avista. Internal-use ReefMaster map; for more information on this map contact Eric Oldenburg ([Eric.Oldenburg@avistacorp.com](mailto:Eric.Oldenburg@avistacorp.com)).

<sup>14</sup> Avista. 2025. Consent Mail approval of Appendix B – Stimson Conservation Easement (July 28, 2025). Avista document identification number 2025-0148.

## **6.3 Fish Passage/Native Salmonid Restoration Plan (License Article 406 – CFSA Appendix C)**

### **6.3.1 Purpose and Resource Benefit**

The purpose of the Fish Passage/Native Salmonid Restoration Plan is “...to mitigate the continuing effects of the project as obstructions to fish passage”, and the resource benefit is “to increase the long-term population viability of native Salmonids in the Lake Pend Oreille (LPO)-lower Clark Fork River system” (FERC License Article 406). This goal is accomplished through the aggressive implementation of the Clark Fork River Native Salmonid Restoration Plan (NSRP).

### **6.3.2 2025 Annual Implementation Plan Project Plans**

#### ***Annual Operations***

- Upstream Fish Passage Program
  - *Variance*<sup>1, 2, 3, 4, 5, 6, 7</sup>; see Section 6.3.4
- Westslope Cutthroat Trout Transport Evaluation
  - *Completed per 2025 AIP*<sup>1, 8</sup>
- Native Salmonid Restoration Plan Five-Year Plan
  - *Variance*<sup>1, 9</sup>; see Section 6.3.4
- Tributary Trapping and Downstream Juvenile Bull Trout Transport Program
  - *Variance*<sup>1, 7</sup>; see Section 6.3.4
- PIT-Monitoring Station Operation and Maintenance
  - *Completed per 2025 AIP*<sup>1</sup>
- Graves Creek Bull Trout Translocation Project
  - *Variance*<sup>1</sup>; see Section 6.3.4

#### ***Facilities***

- No projects proposed for 2025.

#### ***Cabinet Minor Modifications***

- Cabinet Gorge Fish Passage Facility Minor Modifications
  - *Completed per 2025 AIP*<sup>1, 10</sup>

### **6.3.3 Other 2025 Activities**

- At the September 23, 2025 meeting, the MC approved the remainder of funds in the Cabinet Minor Modifications fund for the CGFPF subgroup to allocate for minor modification projects at the CGFPF.
  - *Completed*<sup>1, 10</sup>

### 6.3.4 Projects with Significant Variances

Project Plan	Variances
<p><b>Upstream Fish Passage Program</b></p>	<p>The Upstream Fish Passage Program Annual Project Update for 2023 and 2024 was not completed by December 1, 2025. The new due date is December 1, 2026, and data collected in 2025 will be included in this report.</p> <p>The 2024 Cabinet Gorge Fish Passage Facility Monitoring and Evaluation Plan Update was due on August 30, 2025. The report was finalized in early 2026.</p> <p>Adult Bull Trout captured downstream of Cabinet Gorge Dam in September and October that were transported to the East Fork Bull River were released at a location downstream of the St. Paul Lake Trailhead due to wildfire activity near the St. Paul Lake Trailhead.</p>
<p><b>Native Salmonid Restoration Plan Five-Year Plan</b></p>	<p>Preparation of the MC-review draft was delayed to provide an opportunity for the new Idaho Aquatic Program Lead to add to the draft. This delayed MC review until November 2025. Finalization of the MC-approved Five-Year plan occurred in March 2026.</p> <p>Staff time charged to develop the draft plan in 2025 exceeded the approved budget by \$2,154.</p>
<p><b>Tributary Trapping and Downstream Juvenile Bull Trout Transport Program</b></p>	<p>The Comprehensive Project Report and 2024 Annual Project Update Report were not completed in 2025. These reports were combined and will include data through 2024 and the final Graves Creek Monitoring and Evaluation Plan report. The report is anticipated to be completed in 2026.</p>
<p><b>Graves Creek Bull Trout Translocation Project</b></p>	<p>Completion of the Bull Trout translocation plan, a decision regarding M&amp;E objectives, and the final M&amp;E plan will not move forward because the project completion report, expected in 2026, is anticipated to recommend against translocation of Bull Trout into upper Graves Creek.</p>

### 6.3.5 Key 2025 References

- <sup>1</sup> Bernall, S. 2025. Appendix C Fish Passage/Native Salmonid Restoration Plan. 2025 Annual Work Summary. Avista document identification number 2025-0289.
- <sup>2</sup> Adams, B., A. Parks, and J. VonBargen. 2025. Genetic Analysis of Native Salmonids from the Lake Pend Oreille and Clark Fork River System, Idaho and Montana. 2024 Annual Project Update. Avista document identification number 2025-0222.
- <sup>3</sup> Sprague, L. 2025. Survey for Selected Fish Pathogens in the Lower Clark Fork River and Lake Pend Oreille in Idaho. 2024 Annual Project Update. Avista document identification number 2025-0108.

- <sup>4</sup> Bass, W. and S. Bernall. 2025. Cabinet Gorge Fish Passage Facility Monitoring and Evaluation Plan Year 2 Update. 2024 Annual Project Update. Avista document identification number 2025-0280.
- <sup>5</sup> Avista. 2025. Report Regarding Cabinet Gorge Fish Passage Facility Shutdown (July 7, 2025). FERC Submittal. Avista document identification number 2025-0117.
- <sup>6</sup> Avista. Passive Integrated Transponder (PIT) Tag Database; for more information on this database contact Shana Bernall ([Shana.Bernall@avistacorp.com](mailto:Shana.Bernall@avistacorp.com)).
- <sup>7</sup> Avista. Database for Temperature Monitoring Data Compilation; for more information on this database contact Paul Kusnierz ([Paul.Kusnierz@avistacorp.com](mailto:Paul.Kusnierz@avistacorp.com)).
- <sup>8</sup> Rehm, T. 2025. Westslope Cutthroat Trout Transport Evaluation. Project Completion Report. Avista document identification number 2025-0072.
- <sup>9</sup> Aquatic Implementation Team. 2026. Clark Fork Settlement Agreement Aquatic Protection, Mitigation, and Enhancement Measures Five Year Plan (2026-2030). Avista document identification number 2026-0007.
- <sup>10</sup> Avista. 2025. Clark Fork Settlement Agreement Management Committee Meeting Record from September 23, 2025. Avista document identification number 2025-0264.

## 6.4 Bull Trout Protection and Public Education Project (License Article 407 – CFSA Appendix D)

### 6.4.1 Purpose and Resource Benefit

The purpose of this project is to protect Bull Trout, a federally listed species (threatened), through a combination of enhanced law enforcement efforts by the states of Idaho and Montana, coupled with a public education outreach program. This project will increase the numbers and population viability of Bull Trout by reducing intentional and incidental illegal harvest. In addition, the project increases public awareness on Bull Trout life history, habitat needs, identifying characteristics, and the potential for adverse impacts due to land use and other human activities.

### 6.4.2 2025 Annual Implementation Plan Project Plans

- Idaho Bull Trout Protection and Education Officer Support
  - *Completed per 2025 AIP<sup>1</sup>*
- Montana Bull Trout Education and Communication Support
  - *Variance<sup>1,2</sup>; see Section 6.4.4*
- Montana Bull Trout Education Outreach Support
  - *Completed per 2025 AIP<sup>1</sup>*
- Montana Game Warden Support
  - *Completed per 2025 AIP<sup>1</sup>*
- Trout Unlimited Bull Trout Education Outreach
  - *Variance<sup>1</sup>; see Section 6.4.4*
- Pend Oreille Water Festival
  - *Completed per 2025 AIP<sup>1</sup>*

### 6.4.3 Other 2025 Activities

- No other activities to report.

### 6.4.4 Projects with Significant Variances

Project Plan	Variances
<b>Montana Bull Trout Education and Communication Support</b>	No news releases were published in Sanders County newspapers in 2025, as emphasis was placed on social media postings and their larger audience. Future news releases may be developed in conjunction with social media postings if the need arises.

Project Plan	Variances
<b>Trout Unlimited Bull Trout Education Outreach</b>	<p>The Coordinator, in cooperation with area entities, schools, and the IDFG officer, was able to hold the Kootenai County Water Festival on May 29, 2025, a year earlier than scheduled.</p> <p>The Coordinator was unable to facilitate Facebook related outreach in 2025 due to technical issues. Instead, the Coordinator utilized other outreach methods including fliers, newspaper advertisements, and the Panhandle Chapter Trout Unlimited’s public quarterly newsletter.</p>

### 6.4.5 Key 2025 References

- <sup>1</sup> Moran, S. 2025. Appendix D Bull Trout Protection and Public Education Project. 2025 Annual Work Summary. Avista document identification number 2025-0279.
- <sup>2</sup> Montana Fish, Wildlife and Parks. 2025. Public webpage for Bull Trout conservation with link to identification test. <https://fwp.mt.gov/conservation/fisheries-management/bull-trout> (December 2025).

## 6.5 Watershed Councils Program (License Article 408 – CFSA Appendix E)

### 6.5.1 Purpose and Resource Benefit

The purpose of this program is to facilitate the protection and restoration of tributary stream habitat in the Lake Pend Oreille (LPO)-lower Clark Fork River watershed. This will improve conditions for aquatic life, including macroinvertebrate communities and native fish species (Bull Trout, Westslope Cutthroat Trout, and Mountain Whitefish). The associated protection and enhancement of tributary streams and the aquatic life inhabiting them will serve as mitigation and resource enhancements to offset impacts to aquatic life due to continued power peaking operation of the Cabinet Gorge and Noxon Rapids Projects.

### 6.5.2 2025 Annual Implementation Plan Project Plans

- Pack River Watershed Council, Bonner Soil and Water Conservation District
  - *Completed per 2025 AIP*<sup>1,2,3</sup>
- Lower Clark Fork Watershed Council Projects
  - *Variance*<sup>1,4</sup>; see Section 6.5.4

### 6.5.3 Other 2025 Activities

- No other activities to report.

### 6.5.4 Projects with Significant Variances

Project Plan	Variances
<b>Lower Clark Fork Watershed Council Projects</b>	The Coordinator was unable to attend training in the first half of 2025 due to availability of relevant opportunities and scheduling conflicts with field work. The Coordinator role was vacant in the fall and winter 2025. The LCFWG board is currently in the process of hiring a new coordinator.

### 6.5.5 Key 2025 References

<sup>1</sup> Moran, S. 2025. Appendix E Watershed Councils Program. 2025 Annual Work Summary. Avista document identification number 2025-0278.

<sup>2</sup> Pack River Watershed Council. 2025. The River Ranger. Volume 17, Issue 1. Avista document identification number 2025-0270.

<sup>3</sup> Erickson, J., and S. Garcia. 2025. Public webpage for the Pack River Watershed Council. [www.bonnorswcd.org/pack-river-watershed-council](http://www.bonnorswcd.org/pack-river-watershed-council) (December 2025).

<sup>4</sup> Poiesz, S. 2025. Public webpage for the Lower Clark Fork Watershed Group [www.lowerclarkforkwatershedgroup.org](http://www.lowerclarkforkwatershedgroup.org) (December 2025).

## **6.6 Clark Fork River Water Quality Monitoring Program (License Article 409 – CFSA Appendix F1)**

### **6.6.1 Purpose and Resource Benefit**

The purpose of this program is to provide for the systematic, long-term water quality monitoring of nutrients and metals in the Avista project area. Excessive nutrient loading and metals represent high-priority water quality concerns in the LPO-lower Clark Fork River system. Resource benefits are accomplished through providing valuable information on trends in water quality associated with the Project.

### **6.6.2 2025 Annual Implementation Plan Project Plans**

- Clark Fork River Water Quality Monitoring Program
  - *Completed per 2025 AIP<sup>1, 2, 3</sup>*

### **6.6.3 Other 2025 Activities**

- No other activities to report.

### **6.6.4 Projects with Significant Variances**

- No significant variances to report.

### **6.6.5 Key 2025 References**

<sup>1</sup> Kusnierz, P. 2025. Appendix F1 Clark Fork River Water Quality Monitoring Program. 2025 Annual Work Summary. Avista document identification number 2025-0283.

<sup>2</sup> Osborne, L. 2025. Estimate of 2024 nutrient loads from the Clark Fork River into Lake Pend Oreille. Memorandum. Avista document identification number 2025-0110.

<sup>3</sup> HydroSolutions. 2025. Clark Fork River nutrient water quality status and trends report, 1998–2022. Report to Montana Department of Environmental Quality and Avista. Avista document identification number 2025-0049.

## 6.7 Aquatic Organism Tissue Analysis (License Article 411 – CFSA Appendix F3)

### 6.7.1 Purpose and Resource Benefit

The purpose of this PM&E measure is to ensure that resources are available to monitor aquatic organisms for the presence of heavy metals and/or other substances of concern. It provides funding to collect and analyze fish and other aquatic organism tissue samples. These samples are analyzed to determine the presence of heavy metals or other substances. Resource benefits are accomplished through providing information that can be used to develop and refine fish consumption advisories.

### 6.7.2 2025 Annual Implementation Plan Project Plans

- Noxon and Cabinet Gorge Reservoirs Fish Mercury Study
  - *Variance*<sup>1</sup>; see Section 6.7.4

### 6.7.3 Other 2025 Activities

- No other activities to report.

### 6.7.4 Projects with Significant Variances

Project Plan	Variances
<b>Noxon and Cabinet Gorge Reservoirs Fish Mercury Study</b>	<p>The Comprehensive Project Report was not completed by MFWP by November 1, 2025. It is anticipated to be completed in 2026.</p> <p>The mercury data have not yet been incorporated into Montana’s fish consumption guidelines. It is anticipated that this will be done in 2026 following the completion of the Comprehensive Project Report.</p>

### 6.7.5 Key 2025 References

<sup>1</sup> Kusnierz, P. 2025. Appendix F3 Aquatic Organism Tissue Analysis. 2025 Annual Work Summary. Avista document identification number 2025-0281.

## **6.8 Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities (License Article 412 – CFSA Appendix F4)**

### **6.8.1 Purpose and Resource Benefit**

The purpose and resource benefit of this PM&E measure is to develop and implement a plan that minimizes or eliminates the effects of project-related maintenance, construction, and emergency activities on water quality, aquatic resources, and beneficial uses of the lower Clark Fork River. The Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities at the Cabinet Gorge and Noxon Rapids Hydroelectric Developments was developed in 2002 and updated in 2011. This plan has been continuously implemented since 2002 with case-specific protection measures developed with appropriate stakeholders.

### **6.8.2 2025 Annual Implementation Plan Project Plans**

- Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities
  - *Completed per 2025 AIP*<sup>1, 2, 3, 4</sup>

### **6.8.3 Other 2025 Activities**

- No other activities to report.

### **6.8.4 Projects with Significant Variances**

- No significant variances to report.

### **6.8.5 Key 2025 References**

<sup>1</sup> Kusnierz, P. 2025. Appendix F4 Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities. 2025 Annual Work Summary. Avista document identification number 2025-0284.

<sup>2</sup> Avista. 2025. Email exchange between Paul Kusnierz, Eric Oldenburg, and Steve Lentini regarding compliance with the General Operating Limits in 2025. Avista document identification number 2025-0260.

<sup>3</sup> Avista. 2010. Water Quality Protection and Monitoring Plan for Maintenance, Construction and Emergency Activities. Avista document identification number 2010-0452.

<sup>4</sup> Avista 2025. Designated contacts for notification purposes under the Water Quality Protection and Monitoring Plan (December 2025). Avista document identification number 2025-0245.

## **6.9 Dissolved Gas Supersaturation Control, Mitigation, and Monitoring (License Article 413 – CFSA Appendix F5)**

### **6.9.1 Purpose and Resource Benefit**

The purpose of this measure is to provide for the study, control, mitigation, and monitoring of gas supersaturation and the associated impacts to biological resources in the LPO-lower Clark Fork River system related to spill at the Clark Fork Projects. Resource benefits are accomplished through reducing total dissolved gas (TDG) and mitigating for the potential effects of excess TDG on fish in the Clark Fork River downstream of Cabinet Gorge Dam and in LPO.

### **6.9.2 2025 Annual Implementation Plan Project Plans**

#### ***Operations***

- Operations
  - *Completed per 2025 AIP<sup>1,2</sup>*

#### ***TDG Mitigation and Monitoring Program***

- Total Dissolved Gas Monitoring
  - *Completed per 2025 AIP<sup>1,2,3</sup>*
- Project Scoping Allocation
  - *Completed per 2025 AIP<sup>1</sup>*
- Analysis of Gas Bubble Disease Monitoring Data
  - *Completed per 2025 AIP<sup>1</sup>*
- Mapping the Potential for Fish to Compensate for Total Dissolved Gas in the Lower Clark Fork River
  - *Completed per 2025 AIP<sup>1,4,5</sup>*
- Temperature Monitoring Data Compilation
  - *Completed per 2025 AIP<sup>1,3</sup>*
- Trophic Monitoring in Lake Pend Oreille and Pend Oreille River Idaho
  - *Variance<sup>1</sup>; see Section 6.9.4*
- Box Canyon Reservoir Northern Pike Suppression
  - *Completed per 2025 AIP<sup>1,6</sup>*
- Lake Pend Oreille Walleye Angler Incentive Program
  - *Variance<sup>1</sup>; see Section 6.9.4*
- Lake Pend Oreille/Clark Fork River Walleye Population Assessment
  - *Variance<sup>1</sup>; see Section 6.9.4*

- Lake Pend Oreille Lake Trout Angler Incentive Program
  - *Variance*<sup>1</sup>; see Section 6.9.4
- Lake Pend Oreille Lake Trout Netting Program
  - *Variance*<sup>1</sup>; see Section 6.9.4
- Lake Pend Oreille Bull Trout Population Monitoring and Evaluation
  - *Completed per 2025 AIP*<sup>1,7</sup>
- Idaho Protection and Education Officer Support
  - *Variance*<sup>1</sup>; see Section 6.9.4
- Lake Pend Oreille Tributary PIT-Monitoring Station Operation and Maintenance
  - *Completed per 2025 AIP*<sup>1,3</sup>
- Clark Fork River Population Monitoring
  - *Completed per 2025 AIP*<sup>1,3,8,9</sup>
- Lake Pend Oreille Nearshore Index Netting
  - *Completed per 2025 AIP*<sup>1</sup>
- Lake Pend Oreille and Pend Oreille River Creel Survey
  - *Variance*<sup>1</sup>; see Section 6.9.4
- Lower Clark Fork River Genetics Evaluation
  - *Variance*<sup>1</sup>; see Section 6.9.4
- Gas Supersaturation Control Program Total Dissolved Gas Abatement
  - *Completed per 2025 AIP*<sup>1,10</sup>

### 6.9.3 Other 2025 Activities

- No other activities to report.

#### 6.9.4 Projects with Significant Variances

Project Plan	Variances
<p><b>Trophic Monitoring in Lake Pend Oreille and Pend Oreille River Idaho</b></p>	<p>The July sampling event had multiple hits for both blanks because of possible contamination in the Idaho Department of Environmental Quality (DEQ) water system or possible contaminated preservative. Those results were flagged appropriately.</p> <p>The August sampling event was flagged as an estimate after the laboratory had a result for total Kjeldahl nitrogen (TKN) in their blank water.</p> <p>A September preservation blank returned a detection result for TKN indicating the laboratory preservative was fouled. The DEQ will flag the September results as an estimate and work with the laboratory to make sure the pre-preserved bottles are clean for the 2026 season.</p> <p>Meeting data quality objectives will still be a priority for DEQ moving forward. The DEQ will likely submit a few source water, preservative and equipment blanks in the future to help find and eliminate these sources of contamination.</p> <p>Planned site sampling did not occur at some sites in June (sonde malfunction) and August (boat trailer malfunction and excessive wind).</p>
<p><b>Lake Pend Oreille Walleye Angler Incentive Program</b></p>	<p>The 2024 Lake Pend Oreille Predator Management Program Update was due on November 1, 2025, but was not completed due to a personnel change in the Idaho Aquatic Program Lead position. The report is anticipated to be completed in 2026.</p>
<p><b>Lake Pend Oreille/Clark Fork River Walleye Population Assessment</b></p>	<p>No additional acoustic tagged Walleye were needed to continue the acoustic research portion of this assessment (i.e., enough tags were deployed to successfully track fish). As such, no new fish were implanted with acoustic tags.</p> <p>The 2024 Lake Pend Oreille Predator Management Program Update was due on November 1, 2025, but was not completed due to a personnel change in the Idaho Aquatic Program Lead position. The report is anticipated to be completed in 2026.</p>
<p><b>Lake Pend Oreille Lake Trout Angler Incentive Program</b></p>	<p>The 2024 Lake Pend Oreille Predator Management Program Update was due on November 1, 2025, but was not completed due to a personnel change in the Idaho Aquatic Program Lead position. The report is anticipated to be completed in 2026.</p>

Project Plan	Variances
<b>Lake Pend Oreille Lake Trout Netting Program</b>	The 2024 Lake Pend Oreille Predator Management Program Update was due on November 1, 2025, but was not completed due to a personnel change in the Idaho Aquatic Program Lead position. The report is anticipated to be completed in 2026.
<b>Idaho Protection and Education Officer Support</b>	No new media elements were developed. Previously developed media elements were sufficient to conduct education and outreach efforts.
<b>Lake Pend Oreille and Pend Oreille River Creel Survey</b>	The Lake Pend Oreille and Pend Oreille River Creel Survey report was due on November 1 but has not been completed due to the need for additional analysis and writing. The report is anticipated to be completed in 2026.
<b>Lower Clark Fork River Genetics Evaluation</b>	No evaluation of the contribution of Westslope Cutthroat Trout transported upstream of Cabinet Gorge Dam to the Westslope Cutthroat Trout population in the Clark Fork River downstream of Cabinet Gorge Dam was completed. This research question was not answered because of unforeseen challenges when the project was proposed. Specifically, the addition of a parentage evaluation required a unique genome sequencing process (significant addition of time and expense) and an alternative SNP panel. These additional needs were not available through the IDFG Genetics Lab, and an alternative lab (i.e., MFWP) would have been required. However, the alternative lab did not have the capacity to assist on this project. In addition, the likelihood of identifying parentage connections with the sample size was determined to be minimal and the return on investment at this time was considered too low.

### 6.9.5 Key 2025 References

- <sup>1</sup> Ryan, R., and P. Kusnierz. 2025. Appendix F5 Dissolved Gas Supersaturation Control, Mitigation, and Monitoring. 2025 Annual Work Summary. Avista document identification number 2025-0285.
- <sup>2</sup> Kusnierz, P. 2025. Total Dissolved Gas Monitoring 2025 Cabinet Gorge and Noxon Rapids Dams. Memorandum to the Gas Supersaturation Subcommittee, August 12, 2025. Avista document identification number 2025-0168.
- <sup>3</sup> Avista. Database for Temperature Monitoring Data Compilation; for more information on this database contact Paul Kusnierz ([Paul.Kusnierz@avistacorp.com](mailto:Paul.Kusnierz@avistacorp.com)).
- <sup>4</sup> Avista. Lower Clark Fork River Model Files; for more information on these files contact Paul Kusnierz ([Paul.Kusnierz@avistacorp.com](mailto:Paul.Kusnierz@avistacorp.com)).
- <sup>5</sup> Kusnierz, P., and B. Birdsall. 2025. Mapping the Potential for Fish to Compensate for Total Dissolved Gas in the Lower Clark Fork River. Project Completion Report. Avista

document identification number 2025-0211.

- <sup>6</sup> Harvey, S., and N. Bean. 2025. Box Canyon Reservoir Northern Pike Suppression Project. 2025 Annual Project Update. Avista document identification number 2025-0221.
- <sup>7</sup> Birdsall, B. 2025. Population Demographics, Maturity, Diet, and Migration Timing of Adfluvial Bull Trout in Lake Pend Oreille, Idaho. Comprehensive Project Report. Avista document identification number 2025-0135.
- <sup>8</sup> Birdsall, B., and M. Woodruff. 2025. Lower Clark Fork River Salmonid Abundance Monitoring Project. 2024 Annual Project Update. Avista document identification number 2025-0067.
- <sup>9</sup> Birdsall, B. 2025. 1999 through 2021 Lower Clark Fork River Salmonid Abundance, Population Demographics, and Relative Abundance. Comprehensive Project Report. Avista document identification number 2025-0233.
- <sup>10</sup> Avista. 2025. Gas Supersaturation Subcommittee Meeting Notes from July 30, 2025. Avista document identification number 2025-0169.

## **6.10 Project Operations Package (License Article 429/430/431 – CFSA Appendix T)**

### **6.10.1 Purpose and Resource Benefit**

The purpose of this PM&E measure package is to mitigate for the impacts of maintaining flexibility of project operations. This is to be accomplished by implementing measures that enhance native salmonids and provide recreational fishery opportunities. Most of these implementation measures are addressed in other sections of this report; they primarily concern PM&E measures identified in CFSA appendices A, B, D, and E.

The Project Operations Package also establishes general operating limits for the Clark Fork Project and requires Avista to communicate to Albeni Falls, a downstream U.S. Army Corps of Engineers project, forecasts of daily discharge from Cabinet Gorge Dam.

### **6.10.2 2025 Annual Implementation Plan Project Plans**

- Project Operations and Coordination
  - *Completed per 2025 AIP 1, 2, 3, 4, 5, 6, 7, 8*

### **6.10.3 Other 2025 Activities**

- No other activities to report.

### **6.10.4 Projects with Significant Variances**

- No significant variances to report.

### **6.10.5 Key 2025 References**

<sup>1</sup> Oldenburg, E. 2025. Appendix T Project Operations Package. 2025 Annual Work Summary. Avista document identification number 2025-0287.

<sup>2</sup> Avista. 2010. Water Quality Protection and Monitoring Plan for Maintenance, Construction and Emergency Activities. Avista document identification number 2010-0452.

<sup>3</sup> Avista. 2017. Letter outlining the one-time Avista funding commitment to CFSA Appendix T. Avista document identification number 2017-0432.

<sup>4</sup> Avista. 2025. Email exchange between Paul Kusnierz, Eric Oldenburg, and Steve Lentini regarding communication with the USACE at Albeni Falls in 2025. Avista document identification number 2025-0272.

<sup>5</sup> Avista. 2025. Email exchange between Paul Kusnierz, Eric Oldenburg, and Steve Lentini regarding compliance with the General Operating Limits in 2025. Avista document identification number 2025-0260.

<sup>6</sup> FERC. 2017. Order amending minimum flow pursuant to Article 429. Avista document identification number 2017-0382.

<sup>7</sup> FERC. 2019. Order amending License and approving Exhibits A and F (August 8, 2019). Avista document identification number 2019-0175.

<sup>8</sup> U.S. Geological Survey. 2025. National Water Information System. 12391950 Clark Fork River below Cabinet Gorge Dam ID. Available: [Clark Fork River Below Cabinet Gorge Dam ID - USGS Water Data for the Nation](#) (December 2025).

## Section 7: Terrestrial Resources PM&E Measures Implementation Efforts

### 7.1 Implementation of the Land Use Management Plan (License Article 414 – CFSA Appendix G)

#### 7.1.1 Purpose and Resource Benefit

The purpose of this measure is to provide for the long-term protection and maintenance of sensitive and important resources on Avista-owned project lands, including the existing rural and semi-remote character of the shoreline, through the implementation of the Land Use Management Plan (LUMP). Avista project lands are managed to protect these qualities while still allowing for reasonable public access and other compatible uses.

#### 7.1.2 2025 Annual Implementation Plan Project Plans

- Administration of the LUMP
  - *Variance*<sup>1,2,3,4,5,6</sup>; see Section 7.1.4
- Monitoring Associated with the LUMP
  - *Variance*<sup>1,2</sup>; see Section 7.1.4
- Enforcement Associated with the LUMP
  - *Completed per 2025 AIP*<sup>1,2</sup>
- Managing Aquatic Invasive Plants on Noxon and Cabinet Gorge Reservoirs
  - *Completed per 2025 AIP*<sup>1,7</sup>

#### 7.1.3 Other 2025 Activities

- No other activities to report.

#### 7.1.4 Projects with Significant Variances

Project Plan	Variances
<b>Administration of the LUMP</b>	<p>The 5-year LUMP update was not completed in 2025 due to staff and schedule conflicts. The update will be completed in 2026.</p> <p>Recreation permit markers were ordered in 2024. Installation began in 2025; however, due to staff and schedule conflicts, installation was not completed. Marker installation will be completed in 2026.</p> <p>The Timber Risk Assessment was not completed in 2025 due to contractor availability. The report is expected to be completed in 2026.</p>

Project Plan	Variances
<b>Monitoring Associated with the LUMP</b>	The budget was exceeded by \$29,685, primarily due to labor charges being incorrectly coded to this project. The miscoding has since been corrected, and measures have been implemented to prevent recurrence.

### 7.1.5 Key 2025 References

- <sup>1</sup> Avista. 2025. Appendix G Land Use Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0290.
- <sup>2</sup> Avista. 2010. Avista Utilities Clark Fork Project Land Use Management Plan (revised December 17, 2003 and February 28, 2010). Avista document identification number 2010-0508.
- <sup>3</sup> Avista. 2002. Pesticide and Herbicide Use Plan for the Clark Fork Project, FERC Project No. 2058. Avista document identification number 2002-0020.
- <sup>4</sup> Avista. 2025. Pesticide/Herbicide Application Summary for Clark Fork Project 2025. Avista document identification number 2025-0266.
- <sup>5</sup> Avista. 2025. Terrestrial Resources Technical Advisory Committee Meeting Packet from January 21, 2025. Avista document identification number 2025-0240.
- <sup>6</sup> Avista. 2025. Terrestrial Resources Technical Advisory Committee Meeting Packet from August 27, 2025. Avista document identification number 2025-0239.
- <sup>7</sup> Clean Lakes Inc. 2025. 2025 Aquatic Invasive Species (AIS) Aquatic Pesticide Application Report (APAR). Avista document identification number 2025-0262.

## 7.2 Implementation of the Recreation Resource Management Plan (License Article 415 – CFSA Appendix H)

### 7.2.1 Purpose and Resource Benefit

The purpose of this measure is to provide for appropriate and adequate recreational opportunities and facilities associated with the Clark Fork Project through implementation of the Recreation Resource Management Plan (RRMP). The Land Use, Recreation, and Aesthetics Work Group developed the plan and identified seven goals to be met through its implementation:

- Manage existing recreation resource needs.
- Manage future recreation resource needs.
- Provide adequate and safe public access.
- Preserve recreation resources.
- Coordinate recreation planning and needs.
- Provide cost-effective and desirable recreation opportunities.
- Provide compatible recreation opportunities.

### 7.2.2 2025 Annual Implementation Plan Project Plans

#### *Management Fund*

- Administration and Resource Integration
  - *Variance*<sup>1,2</sup>; see Section 7.2.4
- Monitoring
  - *Completed per 2025 AIP*<sup>1,2,3,4</sup>
- Operation and Maintenance
  - *Completed per 2025 AIP*<sup>1,2</sup>
- Interpretation and Education
  - *Completed per 2025 AIP*<sup>1,2</sup>

#### *Facility Fund*

- North Shore Expansion Acquisition
  - *Variance*<sup>1,2,5</sup>; see Section 7.2.4
- Thompson Falls State Park Group Use Shelter
  - *Variance*<sup>1</sup>; see Section 7.2.4
- Flat Iron Boat Ramp Extension Survey, Design, and Permitting
  - *Variance*<sup>1,6</sup>; see Section 7.2.4
- Supplemental Projects (Tier 2)
  - *Completed per 2025 AIP*<sup>1</sup>

### 7.2.3 Other 2025 Activities

- No other activities to report.

### 7.2.4 Projects with Significant Variances

Project Plan	Variances
<b>Administration and Resource Integration</b>	The RRMP 10-year Update was not completed in 2025. The Recreation Resource Subgroup decided to postpone any update until after the next Comprehensive Survey (proposed to be expedited from 2032 to 2030) which would put the Plan Update date around 3032. This task and product will be removed from the 2026 project plan.
<b>North Shore Expansion Acquisition</b>	Avista worked with the landowner to pursue an acquisition agreement; however, negotiations are ongoing.
<b>Thompson Falls State Park Group Use Shelter</b>	MFWP was not able to identify a local contractor to implement site improvements during 2025. If MFWP is able to secure a contractor, the project will be completed in 2026.
<b>Flat Iron Boat Ramp Extension Survey, Design, and Permitting</b>	The completion of the ramp extension design was delayed from July until December 2025, and therefore corresponding permits were not obtained in 2025. The design portion of the project plan was completed. Permitting and construction tasks will be included in a 2026 project plan.

### 7.2.5 Key 2025 References

- <sup>1</sup> Avista. 2025. Appendix H Implementation of the Recreation Resource Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0291.
- <sup>2</sup> Pinnacle Research and Consulting. 2017. Clark Fork Project Recreation Resource Management Plan, Interim Update. Avista document identification number 2017-0410.
- <sup>3</sup> Pinnacle Research and Consulting. 2025. 2025 Clark Fork Recreation Site Visitation. Avista document identification number 2025-0246.
- <sup>4</sup> Avista. 2025. 2025 Recreation Permit Locations. Avista document identification number 2025-0265.
- <sup>5</sup> MacKay-Sposito. 2024. North Shore Recreation Improvements Due Diligence Report. Avista document identification number 2024-0315.
- <sup>6</sup> Morrison-Maierle. 2025. Technical Specifications – Flat Iron Boat Ramp. Avista document identification number 2025-0261.

### 7.3 Implementation of the Aesthetics Management Plan (License Article 416 – CFSA Appendix I)

#### 7.3.1 Purpose and Resource Benefit

The purpose of this measure is to provide for the protection and enhancement of aesthetic resources associated with Avista’s Clark Fork Project and to mitigate for project related impacts to those resources through the implementation of the Aesthetics Management Plan (AMP). Aesthetic guidelines and considerations of the Aesthetics Management Plan are implemented by permit standards and land use classifications of the Land Use Management Plan (LUMP), site design and monitoring in the Recreation Resources Management Plan (RRMP), and shoreline stabilization guidelines of the Shoreline Stabilization Guidelines Program. Ongoing coordination with other interest groups and agencies will occur as described in the Aesthetics Management Plan.

#### 7.3.2 2025 Annual Implementation Plan Project Plans

- Implementation of the Aesthetics Management Plan
  - *Variance*<sup>1</sup>; see Section 7.3.4

#### 7.3.3 Other 2025 Activities

- No other activities to report.

#### 7.3.4 Projects with Significant Variances

Project Plan	Variances
<b>Implementation of the Aesthetics Management Plan</b>	The key viewpoints re-inventory was completed by Pinnacle in 2023 and the Aesthetics Management Plan, 2023/2024 Addendum was not reviewed by the TRTAC in 2025. It is anticipated to be reviewed and finalized in 2026.

#### 7.3.5 Key 2025 References

<sup>1</sup> Avista. 2025. Appendix I Implementation of the Aesthetics Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0292.

## **7.4 Development and Implementation of Wildlife, Botanical, and Wetland Management Plan (License Article 417 – CFSA Appendix J)**

### **7.4.1 Purpose and Resource Benefit**

The purpose of this resource protection, mitigation, and enhancement measure is to provide for the organization and presentation of the various wildlife, botanical and wetland management activities and site-specific plans within a single, comprehensive management plan document. The goal is to have a dynamic reference document that the in-field staff, technical advisory committees, and Management Committee can utilize and refer to for guidance in implementing the required PM&Es and overall wildlife, botanical, and wetland resource management program for the Clark Fork Project.

### **7.4.2 2025 Annual Implementation Plan Project Plans**

- Development and Implementation of Wildlife, Botanical, and Wetland Management Plan
  - *Completed per 2025 AIP*<sup>1,2,3</sup>

### **7.4.3 Other 2025 Activities**

- No other activities to report.

### **7.4.4 Projects with Significant Variances**

- No significant variances to report.

### **7.4.5 Key 2025 References**

<sup>1</sup> Avista. 2025. Appendix J Development and Implementation of Wildlife, Botanical, and Wetland Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0293.

<sup>2</sup> Avista. 2025. Habitat protected through CFSA Activities 2000–2025. Avista document identification number 2025-0268.

<sup>3</sup> Avista. 2025. Clark Fork Settlement Agreement Management Committee Meeting Record from September 23, 2025. Avista document identification number 2025-0264.

## 7.5 Wildlife Habitat Acquisition, Enhancement, and Management Program (License Article 418 – CFSA Appendix K)

### 7.5.1 Purpose and Resource Benefit

The purpose of this program is to mitigate for the potential effects to wildlife resources and habitat due to the continued operation of the Clark Fork Project. The program will focus on the types of habitat most significantly affected, such as wetland and riparian habitat. The goal is to provide for a continuing source of financial resources that will be used to acquire, protect, enhance, and/or manage important wildlife habitat in the vicinity of the project.

### 7.5.2 2025 Annual Implementation Plan Project Plans

- Operation and Maintenance of Acquired Property and Contingency Fund
  - *Variance*<sup>1</sup>; see Section 7.5.4
- Habitat Acquisition and Conservation and Contingency Fund
  - *Completed per 2025 AIP*<sup>1</sup>
- Wood Duck Re-vegetation Maintenance
  - *Variance*<sup>1</sup>; see Section 7.5.4

### 7.5.3 Other 2025 Activities

- No other activities to report.

### 7.5.4 Projects with Significant Variances

Project Plan	Variances
<b>Operation and Maintenance of Acquired Property and Contingency Fund</b>	The Twin Creek Management Plan and South Fork Bull River Wildlife Management Area Management Plan were not completed in 2025. A contractor has been hired to complete these management plans in early 2026.
<b>Wood Duck Re-vegetation Maintenance</b>	The Wood Duck Re-vegetation Management Plan was not completed in 2025. The draft plan will be sent out for review to the Land Use Subgroup and others in 2026.

### 7.5.5 Key 2025 References

<sup>1</sup> Avista. 2025. Appendix K Wildlife Habitat Acquisition, Enhancement, and Management Program. 2025 Annual Work Summary. Avista document identification number 2025-0294.

## 7.6 Black Cottonwood Habitat Protection and Enhancement (License Article 419 – CFSA Appendix L)

### 7.6.1 Purpose and Resource Benefit

The purpose of this measure is to provide for the protection of black cottonwood trees and stands on Avista owned project lands through the development of site-specific management and enhancement plans for three specific cottonwood sites identified by the Wildlife, Botanical, and Wetlands Work Group. Additionally, existing stands and trees are protected through the implementation of land use classifications in the Land Use Management Plan (LUMP).

### 7.6.2 2025 Annual Implementation Plan Project Plans

- Black Cottonwood Habitat Protection and Enhancement
  - *Variance*<sup>1</sup>; see Section 7.6.4

### 7.6.3 Other 2025 Activities

- No other activities to report.

### 7.6.4 Projects with Significant Variances

Project Plan	Variances
<b>Black Cottonwood Habitat Protection and Enhancement</b>	The Hereford Slough Black Cottonwood Management Plan was not completed in 2025. A contractor has been hired to complete this Plan in 2026.

### 7.6.5 Key 2025 References

<sup>1</sup> Avista. 2025. Appendix L Black Cottonwood Protection and Enhancement. 2025 Annual Work Summary. Avista document identification number 2025-0295.

## **7.7 Wetlands Protection and Enhancement Program (License Article 420 – CFSA Appendix M)**

### **7.7.1 Purpose and Resource Benefit**

The purpose of this measure is to provide for the protection of wetlands occurring on Avista-owned project lands, and for the evaluation and potential enhancement of selected wetland areas. The overall goal is to ensure no net loss of wetlands, or of wetland function and values in certain high-priority wetland areas while also evaluating opportunities for enhancements.

### **7.7.2 2025 Annual Implementation Plan Project Plans**

- Wetlands Protection and Enhancement Program
  - *Completed per 2025 AIP<sup>1</sup>*

### **7.7.3 Other 2025 Activities**

- No other activities to report.

### **7.7.4 Projects with Significant Variances**

- No significant variances to report.

### **7.7.5 Key 2025 References**

<sup>1</sup>Avista. 2025. Appendix M Wetlands Protection and Enhancement Program. 2025 Annual Work Summary. Avista document identification number 2025-0299.

## 7.8 Forest Habitat Protection and Enhancement (License Article 425 – CFSA Appendix P)

### 7.8.1 Purpose and Resource Benefit

The purpose of this measure is to provide for the protection and enhancement of specific parcels of WWP land along the reservoirs. These have been identified as having significant wildlife habitat value. The goal is to maximize the wildlife habitat function and values of these parcels, and to protect them from land use and other activities or changes which might diminish those values.

### 7.8.2 2025 Annual Implementation Plan Project Plans

- South Fork Block Management Area Spotted Knapweed Treatment
  - *Completed per 2025 AIP*<sup>1,2</sup>
- Tuscor Block Management Area Road Development
  - *Completed per 2025 AIP*<sup>1</sup>
- Honey Flats Revegetation
  - *Variance*<sup>1</sup>; see Section 7.8.4

### 7.8.3 Other 2025 Activities

- No other activities to report.

### 7.8.4 Projects with Significant Variances

Project Plan	Variances
<b>Honey Flats Revegetation</b>	Avista and Confederated Salish and Kootenai Tribes (CSKT) performed a site visit in May 2025. Afterwards, Avista researched site access and adjacent property ownership and CSKT began consultation with elders. The project is dependent on CSKT elder input and concurrence.

### 7.8.5 Key 2025 References

<sup>1</sup> Avista. 2025. Appendix P Forest Habitat Protection and Enhancement. 2025 Annual Work Summary. Avista document identification number 2025-0296.

<sup>2</sup> Avista. 2025. Pesticide/Herbicide Application Summary for Clark Fork Project 2025. Avista document identification number 2025-0266.

## **7.9 Reservoir Islands Protection (License Article 426 – CFSA Appendix Q)**

### **7.9.1 Purpose and Resource Benefit**

The purpose of this measure is to provide for the protection of islands owned by Avista in the project reservoirs. The goal is to maintain the unique and high-quality wildlife habitat functions and values of these islands.

### **7.9.2 2025 Annual Implementation Plan Project Plans**

- Reservoir Islands Protection
  - *Completed per 2025 AIP<sup>1</sup>*

### **7.9.3 Other 2025 Activities**

- No other activities to report.

### **7.9.4 Projects with Significant Variances**

- No significant variances to report.

### **7.9.5 Key 2025 References**

<sup>1</sup> Avista. 2025. Appendix Q Reservoir Islands Protection. 2025 Annual Work Summary. Avista document identification number 2025-0297.

## **7.10 Erosion Fund and Shoreline Stabilization Guidelines Program (License Article 428 – CFSA Appendix S)**

### **7.10.1 Purpose and Resource Benefit**

The purpose of this measure is to address impacts to resources of interest caused by erosion attributed to the continued operation of the Clark Fork Project and to develop informational materials and guidelines for the public. Resources of interest include important cultural or natural resources, and private or public property not covered by applicable easement.

### **7.10.2 2025 Annual Implementation Plan Project Plans**

- Implementation of the Erosion Fund and Shoreline Stabilization Guidelines Program
  - *Completed per 2025 AIP*<sup>1</sup>**Other 2025 Activities**
- No other activities to report.

### **7.10.4 Projects with Significant Variances**

- No significant variances to report.

### **7.10.5 Key 2025 References**

<sup>1</sup> Avista. 2025. Appendix S Erosion Fund and Shoreline Stabilization Guidelines Program. 2025 Annual Work Summary. Avista document identification number 2025-0298.

## Section 8: Other Clark Fork License Articles

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This section specifically addresses annual compliance with articles 432 through 443 of the Clark Fork Project License.

### 8.1 Threatened and Endangered Species Plan and Annual Report (License Article 432 – Amended June 13, 2003)

#### 8.1.1 Purpose

Article 432 of the Federal Energy Regulatory Commission (FERC) License requires Avista to submit a Threatened and Endangered Species (T&E) Plan and Annual Report for Commission approval by April 15 each year, following consultation with the Management Committee (MC). The T&E Plan must demonstrate compliance with the Reasonable and Prudent Measures (RPMs) and associated terms of the incidental take statement issued by the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act. The original biological opinion and incidental take statement were issued on August 23, 1999, and included as Appendix D to the FERC License Order.

On March 28, 2018, the FERC initiated formal consultation with the USFWS under Section 7 of the Endangered Species Act regarding Avista’s proposed License Amendment to construct and operate a permanent upstream fish passage facility at Cabinet Gorge Dam [Cabinet Gorge Fish Passage Facility (hereafter, “CGFPF” or “CGDF”)]. On February 1, 2019, the USFWS issued a new biological opinion and incidental take statement covering the CGFPF and continued Project operations, which superseded the 1999 opinion. This updated statement was incorporated into the August 8, 2019 FERC License Order approving CGFPF construction and operation. Compliance with the RPMs and terms in the 2019 incidental take statement will be addressed in this T&E Plan and Annual Report. All references to an “incidental take statement” herein refer to the 2019 version.

In 2002, Avista and the USFWS agreed that Article 432’s T&E planning requirement, as well as Avista’s annual reporting and consultation requirements for several Protection, Mitigation and Enhancement (PM&E) measures, are adequately addressed through the Annual Implementation Plans (AIPs), which are approved by the MC, and by providing the annual activity summaries contained in this section of the Annual Report. Those PM&E measures are:

- Idaho and Montana Tributary Habitat Acquisition and Fishery Enhancement Programs (License Articles 404 and 405).
- Fish Passage/Native Salmonid Restoration Plan (License Article 406).
- Bull Trout Protection and Public Education Project (License Article 407).
- Watershed Councils Program (License Article 408).
- Water Quality Protection and Monitoring Plan for Maintenance, Construction, and Emergency Activities (License Article 412).
- Dissolved Gas Supersaturation Control, Mitigation, and Monitoring (License Article 413).
- Project Operations Package (License Articles 429, 430, and 431).

Section 8.1.2 below provides the 2025 activity report for the PM&E measures listed above, which comprises Avista's T&E Plan and is intended to satisfy Avista's annual reporting requirement for these measures. To assist the Commission and USFWS in evaluating compliance with USFWS's RPMs and their associated terms and conditions, Section 8.1.2 is organized by RPM.

## **8.1.2 2025 Activity Summary**

### **8.1.2.1 Terms and Conditions to Implement RPM #1 and Corresponding Activities**

The incidental take statement's RPM #1 states:

*Identify adult bull trout attempting to migrate upstream of Cabinet Gorge and/or Noxon Rapids Dams, and in a manner agreed to by the Service and consistent with the Clark Fork Settlement Agreement (as amended), provide safe, timely and effective fish passage.*

The four terms and conditions (1–4) and corresponding 2025 activities implementing RPM #1 are listed below.

***1) The likely natal origin of adult bull trout captured downstream of Cabinet Gorge Dam shall be determined using genetic testing, or other methods deemed appropriate by the Service.***

Genetic sampling and testing to determine the likely natal origin of adult Bull Trout was initiated in 1999 and is an ongoing activity for all adult Bull Trout captured downstream of Cabinet Gorge Dam in the lower Clark Fork River. Genetic sample collection and testing in 2025 was approved by the MC, including the USFWS. In 2025, 50 individual adult Bull Trout ( $\geq 300$  mm in length) were captured downstream of Cabinet Gorge Dam. Twenty-seven of these individual fish required rapid-response genetic analysis while the other 23 Bull Trout had been captured in previous years and had already been genetically tested. Capture histories and genetic analysis results for these fish were then used to make upstream transport decisions. Juvenile Bull Trout fin tissue samples were also collected from tributaries to the Clark Fork River and Lake Pend Oreille (LPO) to allow for an improvement in the accuracy of the genetic baseline that is used to determine transport locations.

***2) A permanent fish tagging system shall be implemented for all bull trout handled during monitoring and other fisheries investigation activities in the project area. The tagging system shall have the capability to positively identify bull trout originating from spawning tributaries above Cabinet Gorge and/or Noxon Rapids Dams.***

The established permanent fish tagging system (PIT) was utilized again in 2025 as approved by the MC and the USFWS. All Bull Trout  $\geq 100$  mm in length captured during the implementation of Clark Fork Settlement Agreement (CFSA) projects were implanted with PIT tags. A PIT database, originally developed in 2000, was continually updated in 2025 to house information on all Bull Trout PIT tagged in the Project area. Data from 2025 PIT tagging events were recorded in the PIT database.

**3) *A program to capture and transport adult bull trout originating from tributaries above Cabinet Gorge and/or Noxon Rapids Dams shall be implemented to provide safe, timely and effective upstream fish passage, and shall be implemented in a manner consistent with the Native Salmonid Restoration Plan and the Clark Fork Settlement Agreement (as amended).***

Protocols for capture, transport, and release of Bull Trout were approved by the MC, including the USFWS, in March of 2025.

*Fish Capture:*

The CGFPF was operated in 2025 to capture adult Bull Trout attempting to migrate upstream of Cabinet Gorge Dam. The CGFPF was operated from April 10 through October 17, with one exception. One mechanical issue occurred on June 12 that resulted in a six-day period where personnel could not perform fish lifts. The siphon system remained operational during that period so information on fish attraction to the CGFPF could still be evaluated. This event was reported to the U.S. Fish and Wildlife Service and other management agencies within 24 hours, as well as FERC within 30 days of the event.

The CGFPF subgroup identified and approved funding for eight minor modifications to the CGFPF in 2025 to enhance and improve fish capture and retention. The funds covered the cost of a number of projects including new underwater cameras, an air and strobe light system to deter fish from remaining in the area near the vee trap during fish lifts, additional funds to research options for adding cold water at the CGFPF, and a Siphon Vibration Study to help determine the root cause of vibration in the siphon pipes at the CGFPF and determine potential improvements.

Fifty individual adult Bull Trout were captured downstream of Cabinet Gorge Dam in 2025 (Table 1). Thirteen individuals were captured in the CGFPF (one of these adults genetically assigned to an Idaho tributary and was released) and 36 were captured in the Cabinet Gorge Hatchery (CGH) ladder trap. One additional adult Bull Trout was captured in both the CGFPF and CGH ladder trap in 2025.

**Table 1.** Number of adult Bull Trout ( $\geq 300$  mm in length) captured downstream of Cabinet Gorge Dam under the Upstream Fish Passage Program in 2025 (including recaptures within and between methods).

Method of Capture	Dates of Operation	Bull Trout Handling Events	Adult Bull Trout Transported
CGH Ladder Trap	July 23–October 21	50	34
CGFPF	April 10–October 17	14	13
Total		64	47

The CGFPF subgroup agreed to transport all Montana-origin Bull Trout captured in the CGH ladder trap upstream except for fish originating from Graves Creek. Graves Creek fish were released to give them an opportunity to travel to the CGFPF and allow the opportunity to learn more about the performance of the CGFPF. Graves Creek fish captured three times or starting

September 15 were transported to Montana. Data collected during 2025 is being compiled and will be presented in the Annual Project Update.

As part of the CGFPF M&E Plan, five 3' circular PIT antennas were deployed in the lower Clark Fork River to provide information on Bull Trout presence downstream of Cabinet Gorge Dam. These antennas were deployed in March and operated through early November. A total of 62 Montana-origin Bull Trout were detected downstream of Cabinet Gorge Dam in 2025. Forty-six (74%) of these fish were detected on PIT antennas at the CGFPF and 10 (16%) of these fish were captured in the CGFPF. Thirty-six (58%) of the known 62 Montana-origin Bull Trout detected at any point before capture, were captured in the CGFPF or CGH Ladder Trap.

Under Amendment No. 1 to the CFSA, final design and construction of the Noxon Rapids Dam Permanent Fishway shall be deferred for an interim period ending no sooner than December 31, 2021. In 2025, the third full year of CGFPF operation and ongoing refinement of juvenile Bull Trout capture and transport, discussion of a Noxon Rapids Dam fish collection facility was not resumed. The CGFPF subgroup agreed the next step is compiling data on Bull Trout presence below Noxon Rapids Dam to assess fish passage needs. Avista compiled a list of available data to share with the CGFPF subgroup to identify additional information of interest. Three submersible circular PIT antennas were deployed downstream of Noxon Rapids Dam from April to November to learn more about fish presence below Noxon Rapids Dam. No Bull Trout were detected.

*Fish Transport:*

Forty-seven adult Bull Trout were transported to Montana based on either genetic assignment, previous capture history or criteria that includes the upstream transport of adult Bull Trout genetically assigning to Lightning Creek tributaries once the mouth of Lightning Creek is dry (Table 2). Fish were released directly into the tributary they genetically assigned to within each region.

**Table 2.** Release regions for individual adult Bull Trout captured downstream of Cabinet Gorge Dam and either released in Idaho or transported upstream to Montana in 2025 (not including within year recaptures).

Release Region	Adult Bull Trout
Lower Clark Fork River (Region 1)	3
Cabinet Gorge Reservoir (Region 2)	15
Noxon Reservoir (Region 3)	30
Thompson Falls Reservoir (Region 4)	2
Total	50

*Fish Pathogens:*

Avista is required by the CFSA Amendment No. 1 to collect 60 Bull Trout downstream of Cabinet Gorge Dam and test them for pathogens prior to the issuance of a Montana Fish, Wildlife and Parks (MFWP) import permit. There were no pathogens of concern detected in the group of Bull Trout (captured as bycatch from the LPO Lake Trout Netting Program) tested in 2024, which

allowed for the upstream transport of Bull Trout in 2025. In 2025, 60 adult Bull Trout were again collected and analyzed for pathogens. No pathogens of concern were detected, and these results will be used to apply for a 2026 MFWP import permit.

***4) The upstream capture and transport program shall be adaptively managed, with approval from the Service, in a manner that places priority on maintaining and restoring adfluvial bull trout local populations above Cabinet Gorge and/or Noxon Rapids Dams.***

The 2025 Appendix C Fish Passage/Native Salmonid Restoration Plan AIP, which includes the Upstream Fish Passage Program Project Plan, was reviewed and approved by the WRTAC and MC, including a representative from the USFWS. The Upstream Fish Passage Program Project Plan describes activities related to Bull Trout including upstream transport and release protocols. The USFWS also has a representative on the Aquatic Implementation Team, which is a subgroup that reviews AIPs and the progress of projects on a monthly basis to determine if efforts are aligned with agency requirements and guidelines. The USFWS is also a member of the CGFPF subgroup designated by the MC to provide direction on operation, monitoring and evaluation of the CGFPF. This group meets monthly during periods of CGFPF operation. These annual and monthly review processes allow for adaptive management of local Bull Trout populations above Cabinet Gorge and Noxon Rapids dams.

#### **8.1.2.2 Terms and Conditions to Implement RPM #2 and Corresponding Activities**

The incidental take statement's RPM #2 states:

*Identify juvenile bull trout attempting to migrate downstream to Lake Pend Oreille, and in a manner agreed to by the Service and consistent with the Clark Fork Settlement Agreement (as amended), provide safe, timely and effective fish passage.*

The two terms and conditions (5 and 6) and corresponding 2025 activities implementing RPM #2 are listed below.

***5) A program to trap and transport juvenile bull trout from tributaries above Cabinet Gorge and/or Noxon Rapids Dams shall be implemented to provide safe, timely and effective downstream fish passage, and shall be implemented in a manner consistent with the Native Salmonid Restoration Plan and the Clark Fork Settlement Agreement (as amended).***

Term and Condition 5 of RPM #2 was fulfilled through the adaptively managed Tributary Trapping and Downstream Juvenile Bull Trout Transport Program.

There were a total of 403 capture events of 403 individual juvenile (i.e., <300 mm) Bull Trout during 2025. A total of 337, 120–300 mm, Bull Trout were captured in Montana tributaries and transported to Idaho during 2025 (Table 3). An additional 65 juvenile Bull Trout were captured and released on site because they did not meet one or more of the transport criteria (i.e., fish length or direction of travel). There was one juvenile Bull Trout mortality observed in 2025. The mortality was caused by injury sustained during electrofishing capture. Following capture, fish were measured (length and weight) and implanted with a PIT tag if they were greater than 99 mm and if a PIT tag was not already present. All juvenile transports were released in the lower

Clark Fork River at the Cabinet Gorge Fish Hatchery site.

In Graves Creek there were 29 capture events of 28 individual adult Bull Trout during 2025. Twenty-two of these individuals were transported back to the lower Clark Fork River downstream of Cabinet Gorge Dam (includes a within-year recapture that was previously captured and released onsite), two were released onsite, and four were mortalities. Not included in these adult totals was the capture of a 312 mm long Bull Trout captured during fall electrofishing on the Vermilion River.

**Table 3.** Tributary and method of capture for juvenile Bull Trout transported downstream of Cabinet Gorge Dam under the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program in 2025.

Tributary	Method	Bull Trout Transported
Graves Creek	Permanent Weir	301
East Fork Bull River	Weir/Stream Electrofishing	11
Vermilion River	Stream Electrofishing	25
Total		337

- 6) *The downstream trap and transport program shall be adaptively managed, with approval from the Service, in a manner that places priority on maintaining and restoring adfluvial bull trout local populations above Cabinet Gorge and/or Noxon Rapids Dams.*

Avista works closely with the USFWS through the CFSA process to adaptively manage trapping protocols on an inter- and intra-annual basis. The 2025 Appendix C Fish Passage/Native Salmonid Restoration Plan AIP, including the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program Project Plan, was reviewed and approved by the WRTAC and MC, including a representative from the USFWS. The project plan describes activities related to Bull Trout including protocols. The USFWS also has a representative on the Aquatic Implementation Team, which is a subgroup that reviews AIPs and the progress of projects on a monthly basis to determine if efforts are in line with agency requirements and guidelines. These annual and monthly review processes allow for adaptive management of local Bull Trout populations.

Based on information gathered largely through CFSA programs, it is believed that Graves Creek, East Fork Bull River, and the Vermilion River are the only three Montana tributaries to the lower Clark Fork River within the Avista Project area where meaningful numbers of Bull Trout naturally exhibit a migratory life history. In light of this, the USFWS and MFWP have collectively agreed that juvenile transport efforts should be limited to these three drainages and that these efforts should be, “aggressive but prudent”.

### 8.1.2.3 Terms and Conditions to Implement RPM #3 and Corresponding Activities

The incidental take statement’s RPM #3 states:

*Implement a dissolved gas supersaturation control, mitigation, and monitoring program.*

The three terms and conditions (7–9) and corresponding 2025 activities implementing RPM #3 are listed below.

***7) The Gas Supersaturation and Control Program (and 2009 Addendum), shall be implemented in a manner consistent with the Clark Fork Settlement Agreement (as amended).***

The Gas Supersaturation Control Program and 2009 Addendum were followed in a manner consistent with the CFSA. In addition, funding for Appendix F5 (Dissolved Gas Supersaturation Control, Mitigation, and Monitoring) of the CFSA was made available as described in the Final 2022 Phase III of the Final Gas Supersaturation Control Program Addendum for the Clark Fork Project. In 2025, high-flow spill protocols were followed as described under Term and Condition 8 and total dissolved gas monitoring occurred at two established sites as described under Term and Condition 9.

***8) High-flow spill protocols shall be finalized and implemented to address total dissolved gas production and shall be consistent with the Clark Fork Settlement Agreement (as amended).***

Interim spillgate procedures were formalized in the GSCP approved by the FERC on January 11, 2005 and the GSCP Addendum approved by the FERC on February 19, 2010. Spillway operations at Cabinet Gorge Dam were amended to include the use of spillway 2 in 2014, spillways 4 and 5 in 2016, and spillways 1 and 3 in 2018 after modifications were made to these spillways to reduce total dissolved gas (TDG). The purpose of these spillgate procedures is to achieve the CFSA Appendix F5 requirement to control (i.e., reduce) the amount of TDG produced at Noxon Rapids and Cabinet Gorge dams and reduce potential effects to aquatic organisms downstream.

The spillgate procedures were followed to the extent practicable in 2025; however, FERC-required testing resulted in a variance of the spill protocol. Effects to TDG levels were minimal. At Noxon Rapids Dam, spill occurred on June 3 in association with a FERC inspection and all eight gates were opened to at least one foot on June 18 meeting the FERC requirement for annual spillway gate operation tests. Full height gate tests did not occur in 2025; however, full height gate tests are required once every five years and the most recent tests occurred in 2023 for gates 1–8. At Cabinet Gorge Dam, gates 1 and 3–8 were opened to a height of one foot on May 14 and Gate 2 on May 19, meeting FERC annual gate operation testing requirements. Full height gate tests did not occur in 2025; however, full height gate tests are required once every five years and the most recent tests occurred for all gates in 2022.

***9) Total dissolved gas monitoring shall be done at established sites and shall be conducted in a manner that is consistent the Gas Supersaturation and Control Program (and 2009 Addendum), and the Clark Fork Settlement Agreement (as amended).***

Prior to deployment in 2025, TDG monitoring equipment was sent to the manufacturer for annual maintenance and calibration. Consistent with the GSCP and CFSA, Avista personnel deployed a TDG probe approximately one mile downstream of Cabinet Gorge Dam and in the Cabinet Gorge Dam forebay on March 12. Both stations operated continuously during spill conditions and remained deployed until November 13.

Downstream of Noxon Rapids Dam, from March 12 to June 30, TDG in the Cabinet Gorge Dam Forebay had a mean of 103.1% saturation with a minimum of 98.7% and a maximum of 108.1%. Downstream of Cabinet Gorge Dam, from March 12 to June 30, TDG at the Downstream Cabinet Gorge station, had a mean of 103.3% saturation with a minimum of 94.5% and a maximum of 107.9%. The TDG downstream of Cabinet Gorge Dam never exceeded 110% saturation.

No TDG-reducing modifications were made to Cabinet Gorge Dam in 2025. Proposals for future modifications (if warranted) will be outlined in a future project plan for Appendix F5 through the AIP process.

#### **8.1.2.4 Terms and Conditions to Implement RPM #4 and Corresponding Activities**

The incidental take statement's RPM #4 states:

*Maintain sufficient in-stream flow downstream of Cabinet Gorge Dam.*

The two terms and conditions (10 and 11) and corresponding 2025 activities implementing RPM #4 are listed below.

***10) From September 15 through October 31, the instantaneous minimum flow below Cabinet Gorge Dam shall be maintained at 5,000 cubic feet per second or greater.***

Clark Fork River discharge (i.e., "flow") is estimated both through the dams as well as at the U.S. Geological Survey gage station located approximately 500 m downstream of Cabinet Gorge Dam. Computers in the Cabinet Gorge Dam control room constantly monitor discharge through turbines and spillgates. Accusonic flow meters located in the penstocks relay individual unit discharge to the control room computers. The Cabinet Gorge Dam minimum flow General Operating Limit was modified in late 2017 and is 3,000 cfs during the period from November 1 through September 14 and 5,000 cfs from September 15 through October 31. The 5,000 cfs minimum flow was maintained from September 15 through October 31, 2025.

***11) From November 1 through September 14, the instantaneous minimum flow below Cabinet Gorge Dam shall be maintained at 3,000 cubic feet per second or greater.***

The 3,000 cfs minimum flow was maintained from November 1, 2024 through September 14, 2025.

#### **8.1.2.5 Terms and Conditions to Implement RPM #5 and Corresponding Activities**

The incidental take statement's RPM #5 states:

*Implement a program that manages non-native species in a manner that is beneficial for bull trout.*

The two terms and conditions (12 and 13) and corresponding 2025 activities implementing RPM #5 are listed below.

***12) Non-native fish management programs shall be implemented in the Clark Fork Project action area for the benefit of bull trout and shall be implemented in a manner consistent with the Native Salmonid Restoration Plan and the Clark Fork Settlement Agreement (as amended).***

In 2018, the MC approved the Clark Fork River Native Salmonid Restoration Plan (NSRP) Five-Year Plan for the 2019 through 2023 time period, consistent with the CFSA and RPM #5. This update highlighted numerous potential actions and data needs for developing non-native species management plans for future implementation. Efforts undertaken in 2025 in accordance with this direction included Lake Trout angler incentive and gill net suppression programs in LPO, assessing the Walleye population and feasibility of Walleye suppression through an angler incentive program on the LPO-lower Clark Fork River, suppression of Northern Pike in Box Canyon Reservoir, and continuation of less intensive actions to suppress non-native fish in the East Fork Bull River. The details of these activities are described below.

*Lake Pend Oreille Lake Trout Angler Incentive Program:*

This program has been implemented annually since 2006 to reduce predator, specifically Lake Trout, abundance in LPO. In 2025, funding of the LPO Angler Incentive Program continued. Anglers participating in the program turned in Lake Trout heads along with information cards at freezers maintained at access points around LPO. In 2025, anglers turned in 1,432 Lake Trout (Table 4), which was less than the 1,992 turned in during 2024.

Lake Pend Oreille Lake Trout Angler Incentive Program funds were also used to sponsor angling derbies on LPO. Sponsorship dollars were used to encourage additional anglers to participate in harvest-oriented angling of LPO Lake Trout and to encourage Bull Trout education. In 2025, five LPO derbies were recipients of sponsorship funding.

*Lake Pend Oreille Lake Trout Netting Program:*

Reducing predatory fish abundance in LPO is beneficial to Bull Trout because it reduces piscivory by Lake Trout, reduces competition for food, and increases kokanee (a primary prey for Bull Trout) abundance. The focus of this program is Lake Trout reduction and the program has been implemented annually, in conjunction with the LPO Lake Trout Angler Incentive Program, since 2006.

In 2025, the LPO Lake Trout Netting Program was implemented for the twentieth year and removed 5,270 Lake Trout (Table 4). Since 2006, a combination of angling and netting has removed almost 285,600 Lake Trout. Netting catch rates for Lake Trout have declined substantially since the program was initiated.

**Table 4.** Lake Trout harvested and removed from LPO, Idaho in 2025 by collection method.

Collection Method	Lake Trout Harvested
Angling	1,432
Netting	5,270
Total	6,702

An increase in the kokanee population has been associated with the reduction in the Lake Trout population. Age-specific abundance estimates are not yet finalized for 2025. Kokanee abundance increased from about 2010–2013 and, with minor fluctuations, has remained above the 20-year average since.

The Bull Trout population has remained robust in the Idaho portion of the LPO core area. Idaho Department of Fish and Game continues to observe high Bull Trout catch and low mortality in gill-netting operations. The responses observed to date suggest that suppression of Lake Trout can be achieved and provide benefits for both kokanee and Bull Trout. Lake Pend Oreille predator removal success will continue to be monitored by evaluating the population response of Lake Trout, Bull Trout, and kokanee.

Lake Pend Oreille/Clark Fork River Walleye Population Assessment:

Walleye, which were illegally introduced into Noxon Reservoir approximately 35 years ago, have become well established throughout Noxon and Cabinet Gorge reservoirs and have reached LPO. An expanding Walleye population has the potential to put several fish populations in LPO at risk through direct predation and competition. This project was first implemented in 2018 to collect fundamental information to help assess the current status of the Walleye population in LPO, to evaluate the opportunities for management (suppression), and estimate the likely scope of their influence on the current fish community in LPO.

Telemetry efforts (tracking acoustic- and radio-tagged Walleye) were used to inform netting locations and strategies as well as inform anglers participating in the LPO Walleye Angler Incentive Program. Walleye were concentrated in relatively shallow water and gill-net catch rates were relatively high while bycatch was reasonably low. A total of 1,055 Walleye were removed in 2025 (Table 5).

Lake Pend Oreille Walleye Angler Incentive Program:

This program was first implemented in 2019 to evaluate the potential to reduce the Walleye abundance in LPO through angling. Anglers participating in the program turned in Walleye heads along with information cards at freezers maintained at access points around LPO. In 2025, anglers turned in 4,842 Walleye (Table 5), about 1,600 more than the number turned in during 2024.

**Table 5.** Walleye harvested and removed from LPO, Idaho in 2025 by collection method.

Collection Method	Walleye Harvested
Angling	4,842
Netting	1,055
Total	5,897

Box Canyon Reservoir Northern Pike Suppression:

Northern Pike were illegally introduced in the Clark Fork drainage in Montana and have expanded to the Pend Oreille River, where they have caused declines in native species and game

fish being managed by the Kalispel Tribe Natural Resources Department (KNRD), Washington Department of Fish and Wildlife (WDFW), and IDFG. Northern Pike range expansion threatens recovery efforts for Bull Trout and Westslope Cutthroat Trout, as well as other native salmonids, minnows, suckers and introduced game fish within the watershed. Reducing the predatory effect of Northern Pike on Bull Trout increases the probability that entrained fish are collected and transported upstream of Albeni Falls Dam.

After being detected in 2004, the Northern Pike population grew exponentially in Box Canyon Reservoir to over 5,500 in 2010. In 2012, KNRD supported by WDFW, and funded in part by Avista under the CFSA, initiated a mechanical suppression program to reduce the population of Northern Pike within Box Canyon Reservoir. This suppression has been successful in significantly reducing the Northern Pike in Box Canyon Reservoir and efforts since 2015 have been focused on maintaining this greatly reduced Northern Pike population. The objective of Northern Pike suppression is to maintain the abundance of Northern Pike in Box Canyon Reservoir at or below the target of <1.73 Northern Pike /net night in the southern half of Box Canyon Reservoir and <0.5 Northern Pike /net night in the north as monitored in the annual Spring Pike Index Netting (SPIN) survey. Based on the 2025 SPIN results of a mean CPUE of 0.04 Northern Pike/net night in the core area that includes the southern half of the reservoir and all sloughs (target < 1.7), and no Northern Pike captured north of Riverbend (target < 0.5), the greatly reduced relative abundance of Northern Pike in the reservoir has been maintained after multiple years of mechanical suppression.

*Non-native Fish Suppression Project in the East Fork Bull River:*

The eight-year non-native fish suppression project in the East Fork Bull River was implemented from 2007 through 2014. Based on the results of this project, less intensive suppression methods were implemented from 2015 through 2025. The less intensive methods of suppression included the transport and release of non-native trout captured in fish traps to the lower Bull River and the excavation and genetic analysis of eggs from putative Brown Trout redds.

Efforts to remove non-native trout in 2025 began with the September 2 installation of fish traps in the lower East Fork Bull River under the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program. In 2025, a total of 116 non-native salmonids were captured in all traps, with 89 Brown Trout (plus 14 mortalities), and 8 Brook Trout (plus 5 mortalities) being transported and released in the lower Bull River. Excavation of Brown Trout redds to subsample eggs for genetic analysis was to have occurred in mid-November. However, a rain-on-snow event and resultant high streamflow precluded accomplishing this task in 2025.

***13) Non-native fish management programs shall be adaptively managed, with approval from the Service, in a manner that places priority on maintaining and restoring adfluvial bull trout local populations within the Lake Pend Oreille Core Area.***

The MC, including the USFWS, approved an updated NSRP Five-Year Plan in 2018. The purpose of this NSRP Five-Year Plan is to provide continued and consistent guidance of implementation of key aquatic PM&Es for the 2019 through 2023 time period. This includes implementation of CFSA appendices A, B, C, and F5 and denotes a need to identify, evaluate, and if appropriate, address non-native species concerns. More specifically, under Appendix C of the NSRP Five-Year

Plan, there is agreement that management efforts should be concentrated on those streams known to be utilized by migratory native salmonids (i.e., East Fork Bull River, Vermilion River, and Graves Creek).

The NSRP Five-Year Plan was to be updated in 2024 with input and approval from all stakeholders including the USFWS. During the initial meetings for the next Five-Year Plan, it was proposed to include all aquatic PM&Es (i.e., adding sections for CFSA appendices D, E, F1–F4). Internal review of the draft plan took longer than anticipated; therefore, the plan update was not completed in 2024. Efforts to complete the five-year plan continued in 2025, including allowing the new Idaho Aquatic Program Lead an opportunity to review and add to the draft. This additional review included proposed investigations into non-native suppression in important Idaho Bull Trout rearing tributaries. Additionally, all non-native fish management project plans are reviewed and approved by the WRTAC and the MC, including a representative from the USFWS. The USFWS also has a representative on the Aquatic Implementation Team, which is a subgroup that reviews AIPs and the progress of projects on a monthly basis to determine if efforts are in line with agency requirements and guidelines.

#### **8.1.2.6 Terms and Conditions to Implement RPM #6 and Corresponding Activities**

The incidental take statement's RPM #6 states:

*Implement the Native Salmonid Restoration Plan and Clark Fork Settlement Agreement (as amended) in a manner consistent with the Final Bull Trout Recovery Plan and Columbia Headwaters Recovery Unit Implementation Plan.*

The term and condition (14) and corresponding 2025 activities implementing RPM #6 are listed below.

***14) Tributary enhancement programs shall be adaptively managed, with approval from the Service, in a manner that places priority on maintaining and restoring adfluvial bull trout local populations within the Lake Pend Oreille Core Area.***

Bull Trout upstream and downstream transport programs were implemented in 2025, as described in RPM #1 and #2, above. These programs are implemented annually to restore adfluvial Bull Trout populations in the lower Clark Fork River–Lake Pend Oreille watershed consistent with the intent of the NSRP and CFSA. The NSRP is updated every five years to reflect new information learned and guide the next five years of native salmonid restoration. All Annual Implementation Plans for tributary enhancement projects are reviewed and approved by the WRTAC and MC. The Aquatic Implementation Team is a subgroup of the WRTAC that reviews AIPs and the progress of projects on a monthly basis to determine if efforts are in line with agency requirements and guidelines. These annual and monthly review processes allow for adaptive management of all tributary enhancement projects.

Coordination and outreach to inform and facilitate both the public and cooperating agencies' involvement in tributary habitat protection and enhancement efforts is the principal consideration of the Watershed Councils Program (CFSA Appendix E). Efforts in Idaho and Montana in 2025 included holding meetings between Watershed Council groups and cooperators, the distribution of

outreach materials including websites, and assisting with the administration required to help develop watershed restoration plans, secure grants, and execute contracting and permitting necessary for implementing stream enhancement and restoration efforts.

Tributary habitat protection and enhancement to benefit native salmonids is the principal consideration of the Idaho and Montana Tributary Habitat Acquisition and Fishery Enhancement Programs (CFSA appendices A and B). Efforts undertaken in 2025 in Idaho included the continued cooperative development of stream habitat prioritization evaluations for critical native salmonid tributaries in the Pack River drainage, and monitoring large woody debris added to Rattle Creek in 2024 to enhance Bull Trout spawning and rearing conditions.

In Montana, efforts undertaken in 2025 included the continuation of riparian reforestation efforts along the Bull River and adjacent areas of the lower East Fork Bull River, and continuation of an extensive pre-construction survey to inform ongoing and upcoming channel reconstruction projects in the Vermilion River, from which data was used to inform a design for the next reach of restoration that was finalized in 2024. In 2025 this design was utilized by a construction firm hired by the Lower Clark Fork Watershed Group under a Cooperative Agreement with the U.S. Forest Service, Kootenai National Forest, to construct over 2,000 feet of restored channel along the Grouse Creek Reach of the Vermilion River. Construction of this new reach occurred in the summer and initial revegetation plantings occurred in the fall of 2025.

Two reports that investigated Montana tributary habitat enhancement efforts were completed in 2025. The first of these was a summary of over 25 years of stream restoration efforts along Montana tributaries, while the other investigated habitat variables and native species abundance in a pair of headwater tributaries.

Annual fisheries monitoring is conducted under both the Idaho and Montana programs to inform cooperators of the status, abundance, and distribution of species of special concern, non-native species abundance and distribution, and through redd surveys, monitoring trends in Bull Trout spawning effort. A design for the relocation of a trailhead, associated parking area and the removal of a vault toilet was finalized in 2025. This project was to have been implemented in 2025, but due to Federal funding constraints, it has now been postponed. It is hoped that this design will be utilized in the near future to help protect a critical Bull Trout spawning area in the East Fork Bull River.

### **8.1.2.7 Terms and Conditions to Implement RPM #7 and Corresponding Activities**

The incidental take statement's RPM #7 states:

*Implement reporting and consultation requirements as outlined in the terms and conditions below in order to minimize take of bull trout related to implementation of the Native Salmonid Restoration Plan and other fisheries monitoring activities.*

The six terms and conditions (15 through 20) and corresponding 2025 activities implementing RPM #7 are listed below.

***15) An annual assessment of bull trout populations in the Lake Pend Oreille Core Area shall***

***be prepared and submitted to the Service. The assessment shall be conducted in a manner consistent with the Clark Fork Settlement Agreement (as amended), and use the best available information (e.g., tributary redd counts).***

*Bull Trout Redd Surveys and Abundance Monitoring in LPO Core Area Tributaries:*

The 2025 Idaho annual redd count table was provided, by email, to the USFWS from IDFG on October 23, 2025. Bull Trout redd numbers were less than observed in 2024, and below the 10-year and 20-year mean values. The 2025 Montana annual redd count report is being finalized and will be submitted to the USFWS in early 2026.

Forty-eight electrofishing surveys were conducted on tributaries to LPO and the Clark Fork River in 2025. Bull Trout juveniles were sampled in Caribou, East Fork Lightning, Gold, Granite, Grouse, Rattle, and Trestle creeks. Bull Trout x Brook Trout hybrid juveniles were sampled in Grouse and Granite creeks.

*Lake Pend Oreille Bull Trout Population Monitoring and Evaluation:*

This is a continuing activity that was first approved by the MC in 2021. This project replaces the “Lake Pend Oreille Bull Trout Survival Study” (completed in 2021) and will provide a mechanism to combine the unique and valuable data that has been collected through CFSA projects into one integrated monitoring program. Many of these data sets have been collected through previous CFSA-supported projects but also include data collected through other funding mechanisms. Specifically, Bull Trout-specific data collected from the LPO netting programs (Lake Trout and Walleye), angler incentive programs, tributary monitoring, PIT antennas, and redd counts will be evaluated together in this project. These data will be utilized together to evaluate the LPO Bull Trout metapopulation. In 2025, most of the work consisted of data analysis (i.e., age and length at maturity, migration timing, diet composition, and population demographics) and writing the Comprehensive Project Report. The information associated with this project is available through CFSA project plans and reports.

***16) An assessment of Lake Pend Oreille prey base population trends shall be prepared and submitted to the Service. The assessment shall be conducted in a manner consistent with the Clark Fork Settlement Agreement (as amended), be based on the best available information, and evaluate the need for measures to benefit bull trout prey species in Lake Pend Oreille.***

Idaho Department of Fish and Game continued annual monitoring and assessment of LPO prey base population trends. Based upon 2003 interagency discussions and IDFG management actions, IDFG, in consultation with Avista and USFWS, conducted the twentieth season of a large-scale spring and fall netting operation on LPO in 2025. Periodic updates of this netting operation are provided to both Avista and USFWS, through email, by IDFG. These program updates constitute Avista’s “assessment” and “evaluation of need” for 2025. Annual kokanee total abundance estimates associated with the LPO Lake Trout Netting Program provide further insight into the LPO prey base.

***17) An annual report shall be submitted to the Service indicating the actual number of bull trout taken, if any, as well as any relevant biological/habitat data or other pertinent information on bull trout that was collected. This report shall be submitted to the Service by***

*March 31<sup>st</sup> each year.*

This annual report satisfies this Term and Condition. During field activities conducted in 2025, the total number of Bull Trout handled and “the extent of intentional and incidental take” for Bull Trout is described in Table 6. The number of Bull Trout proposed to be intentionally “taken” by each activity in 2026 is also outlined in Table 6. In addition to this annual report, numerous technical reports are completed through CFSA activities annually and provided to the Service that include additional relevant biological/habitat information.

There was a total of 1,471 Bull Trout capture events during implementation of CFSA Appendix F5 LPO Lake Trout Netting in 2025, which includes 313 mortalities, and is covered under a separate Section 6 Agreement between the USFWS and IDFG. The LPO Lake Trout Angler Incentive Program reported four Bull Trout mortalities that were misidentified and submitted for payments as putative Lake Trout. There were 15 Bull Trout handling events during gill-netting efforts targeting Walleye in LPO under the CFSA Appendix F5 LPO/Clark Fork River Walleye Population Assessment program with two incidental Bull Trout mortalities. There were three Bull Trout handling events during work under Appendix F5 LPO Nearshore Index Netting; all three were mortalities. There were no Bull Trout handling events during work on the lower Clark Fork River under Appendix F5 Clark Fork River Population Monitoring. These events are also reported under the Section 6 agreement between the USFWS and IDFG. There were likely instances where Bull Trout were handled multiple times under the programs described previously and some of these Bull Trout may have been handled during implementation of CFSA Appendix C programs in 2025.

Bull Trout “take” numbers for CFSA appendices A and B programs are also reported by IDFG and MFWP personnel as part of their reporting requirements. These numbers are included with CFSA Appendix C Bull Trout “take” numbers in Table 6. There were 385 Bull Trout capture events under Appendix A, including one recapture in 2025. Appendix B project implementation resulted in the intentional take of 164 unique Bull Trout. A total of 454 unique Bull Trout were handled during CFSA Appendix C program implementation. Twenty-eight were adult Bull Trout transported upstream of Cabinet Gorge Dam in 2025 and later captured in the Graves Creek permanent weir trap.

**Table 6.** Bull Trout take and mortalities reported in 2025 along with proposed intentional take for 2026.

CFSA Program	Capture Events	Unique Bull Trout	Bull Trout Mortalities	Proposed 2026 Bull Trout Take
Appendix A	385	384	0	600
Appendix B	164	164	5	350
Appendix C	497	454	5	1,000
Total	1,046	1,002	10	1,950

*18) An annual report shall be prepared and submitted to the Service that details the next year's proposed activities under the Native Salmonid Restoration Plan and other fisheries*

***monitoring that may result in intentional as well as incidental take of bull trout. The report shall quantify the number of bull trout proposed to be intentionally "taken" by each activity and summarize the extent of intentional take from all previous year's activities. This report shall be submitted to the Service by March 31<sup>st</sup> each year.***

The USFWS, as a member of the MC, reviews and approves AIPs for the NSRP and other fisheries monitoring plans that have the potential to result in take of Bull Trout. This review process begins at the technical level with the Aquatic Implementation Team and continues through the WRTAC, with final approval of all proposed AIPs occurring at the March MC meeting.

The USFWS also verified that the information reported in this annual report is sufficient to cover the requirement for a report quantifying the number of Bull Trout proposed to be intentionally "taken" (see Table 6, above) and summarizing the extent of intentional take from all previous year's activities.

***19) During project implementation the FERC or licensee shall promptly notify the Service of any emergency or unanticipated situations arising that may be detrimental for bull trout relative to the proposed activity.***

No emergency or unanticipated situations arose during 2025 beyond those described regarding the reporting of dead or injured Bull Trout described in Term and Condition 20 below.

***20) Upon locating dead or injured bull trout, or upon observing destruction of bull trout redds, the FERC or licensee shall notify the Service within 24 hours. The FERC or licensee shall record information relative to the date, time, and location of dead or injured bull trout when found, and possible cause of injury or death of each fish and provide this information to the Service.***

As directed by the USFWS, notifications of all dead or injured Bull Trout were sent to the USFWS representatives Carter Fredenberg and Ben Conard. Bull Trout mortalities were reported to the USFWS on 4 occasions during 2025. The first report was submitted to the USFWS on October 1, 2025. This report pertained to an adult Bull Trout post-spawn mortality that occurred at Graves Creek permanent weir trap. This event was investigated and injuries sustained in the fish trap were suspected to have contributed to this mortality. Efforts were then undertaken including lower within-trap water levels and installing padding, to minimize this potential for injuries. The second report was submitted to the USFWS on October 24, 2025, and pertained to two post-spawn adult Bull Trout recovered from the Graves Creek permanent weir trap. The male was suspected to have succumbed to injuries sustained naturally, while the female was thought to have trap injuries that likely contributed to its demise. A third report was submitted to the USFWS on October 31, 2025, pertaining to a post-spawn adult female Bull Trout that was recovered from the Graves Creek permanent weir trap as a mortality. This individual appeared to have received older-looking injuries, but injuries sustained while in the trap may have contributed as well.

The final report was submitted on November 10, 2025, and pertained to a young-of-the-year Bull Trout that sustained injuries while electrofishing the Vermilion River on October 30, 2025. An oversight resulted in late reporting to the USFWS. Following this event Avista biologists

emphasized the importance of immediate mortality reporting with fisheries staff to minimize the likelihood of future late reports.

Bull Trout mortalities unrelated to implementation of CFSA activities (e.g., post-spawn mortalities observed during redd surveys) were informally reported to the USFWS as they were observed.

#### **8.1.2.8 Terms and Conditions to Implement RPM # 8 and Corresponding Activities**

The incidental take statement's RPM #8 states:

*Construct and operate the CGFPF consistent with Amendment #1 of the Clark Fork Settlement Agreement, and the Clark Fork Project License (including amendments).*

The five terms and conditions (21 through 25) and corresponding 2025 activities implementing RPM #8 are listed below.

***21) The FERC or licensee shall ensure that construction, operation, and maintenance of the CGDF remain consistent with the proposed action described in the final Biological Assessment (Avista and FERC 2017). The Service shall be promptly notified of any changes to construction, operations or maintenance activities.***

Avista completed construction of the CGFPF in 2022. Avista operated and maintained the CGFPF consistent with the proposed action described in the final Biological Assessment. One mechanical issue resulted in a short-term shutdown, which was reported to the USFWS and other management agencies within 24 hours, as well as FERC within 30 days of the event. More detail on this shutdown event is included under Term and Condition 25.

***22) The fish salvage plan shall be completed and approved by the Service prior to construction of the cofferdam.***

The USFWS approved the CGFPF Fish Salvage Plan on February 12, 2019; followed by approval by the FERC on November 19, 2019.

***23) The FERC or licensee shall provide an annual report to the Service detailing the progress of CGDF construction. This report shall be submitted to the Service by March 31<sup>st</sup> each year.***

Avista completed construction of the CGFPF in 2022. This annual report, including the discussion under Term and Condition 3, satisfies this requirement.

***24) The FERC or licensee shall provide an annual report to the Service detailing the past year's operation of the CGDF, including the number of bull trout that interacted with the CGDF and any mortality. This information can be included in the annual report required under T&C 17 above and shall be submitted to the Service by March 31<sup>st</sup> each year.***

This annual report, including the discussion under Term and Conditions 3 and 17, satisfies this requirement.

***25) Any shut-downs of the CGDF during normal operating conditions, as agreed to in the Clark for Settlement Agreement (as amended), shall be reported within 24 hours to the Service.***

The CGFPF was operated from April 10 through October 17, with one exception. A mechanical issue occurred on June 12 that resulted in a six-day period where personnel could not perform fish lifts. The siphon system remained operational during that period so information on fish attraction to the CGFPF could still be evaluated. This event was reported to the U. S. Fish and Wildlife Service and other management agencies within 24 hours, as well as FERC within 30 days of the event.

### **8.1.3 Key 2025 References**

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## **8.2 Fishway Plan and Annual Report (License Article 433 – Amended June 13, 2003)**

### **8.2.1 Purpose**

Article 433 of the FERC License (License) requires that, on or before April 15 of each year and after consultation with the MC, the Licensee file for Commission approval a Fishway Plan and Annual Report. The Plan must address the Licensee's compliance with the USFWS Section 18 fishway prescriptions contained in CFSA Appendix C to the License, including a detailed description of any fish passage devices or measures and any proposed modifications to project facilities or operations; documentation of any consultations; copies of comments and recommendations received on the completed plan; and specific descriptions of how entities' comments are accommodated by the Plan or Avista's reasons for not including such comments, based on Project-specific information.

In 2002, Avista and USFWS agreed that the Article 433 Fishway Plan requirement, as well as Avista's annual reporting and consultation requirements for CFSA appendices A, B, and C (License Articles 404, 405, and 406) are adequately addressed through the AIPs, which are approved by the MC, and by providing the annual activity summaries contained in this section of the Annual Report. Section 8.2.2 below provides the 2025 activity report for these PM&E measures, which comprises Avista's Fishway Plan and is intended to satisfy Avista's annual reporting requirement for these measures.

### **8.2.2 2025 Activity Summary**

#### **8.2.2.1 Prescription 1 Conditions and Corresponding Activities**

##### ***Prescription 1 Description***

USFWS's Section 18 Prescription 1 states the following:

*The licensee shall assess, plan, design, construct, operate, and maintain upstream fishway devices or measures and downstream fish protection devices or measures in accordance with the Native Salmonid Restoration Plan (Plan) (License Application Volume IV.A). Construction, operation, and maintenance of fishways will proceed in a stepwise manner, beginning at the effective date of the Settlement Agreement (License Application Volume III), utilizing the principles of adaptive management (i.e., the ability to change program direction based on new information provided by monitoring and evaluation of experimental measures). Following initial feasibility assessments, and within one year of the effective date of the Settlement Agreement, an experimental fish trap and truck program for the purpose of moving bull trout from below Cabinet Gorge Dam to the Cabinet Gorge Reservoir pool shall be constructed, operated, and maintained. Assessment and implementation of other fish stock enhancement measures shall begin at the effective date of the Settlement Agreement, as described in the Plan. Evaluation of the effectiveness of the fish trap and truck program below Cabinet Gorge, and evaluation of other stock enhancement measures will determine the timing of construction, operation, and maintenance of other upstream fishway*

*facilities and measures and downstream fish entrainment protection devices at Cabinet Gorge and Noxon Rapids Dams.*

### ***2025 Activities Associated with Prescription 1***

#### *Cabinet Gorge Fish Passage Facility:*

The CGFPF was operated in 2025 to capture adult Bull Trout attempting to migrate upstream of Cabinet Gorge Dam. The CGFPF was operated from April 10 through October 17, with one exception. One mechanical issue occurred on June 12 that resulted in a six-day period where personnel could not perform fish lifts. The siphon system remained operational during that period so information on fish attraction to the CGFPF could still be evaluated. This event was reported to the U.S. Fish and Wildlife Service and other management agencies within 24 hours, as well as FERC within 30 days of the event.

The CGFPF subgroup identified and approved funding for eight minor modifications to the CGFPF in 2025 to enhance and improve fish capture and retention. The funds covered the cost of a number of projects including new underwater cameras, an air and strobe light system to deter fish from remaining in the area near the vee trap during fish lifts, additional funds to research options for adding cold water at the CGFPF, and a Siphon Vibration Study to help determine the root cause of vibration in the siphon pipes at the CGFPF and determine potential improvements.

#### *Adult Bull Trout Capture, Transport and Detection:*

Fifty individual adult Bull Trout were captured downstream of Cabinet Gorge Dam in 2025. Thirteen individuals were captured in the CGFPF (one of these adults genetically assigned to an Idaho tributary and was released) and 36 were captured in the CGH ladder trap. One additional adult Bull Trout was captured in both the CGFPF and CGH ladder trap in 2025.

The CGFPF subgroup agreed to transport all Montana-origin Bull Trout captured in the CGH ladder trap upstream except for fish originating from Graves Creek. Graves Creek fish were released to give them an opportunity to travel to the CGFPF and allow the opportunity to learn more about the performance of the CGFPF. Graves Creek fish captured three times or starting September 15 were transported to Montana. Data collected during 2025 is being compiled and will be presented in the Annual Project Update.

Forty-seven adult Bull Trout were transported to Montana based on either genetic assignment, previous capture history or criteria that includes the upstream transport of adult Bull Trout genetically assigning to Lightning Creek tributaries once the mouth of Lightning Creek is dry. Fish were released directly into the tributary they genetically assigned to within each region. Fifteen adult Bull Trout were transported to Region 2 (including eight fish that genetically assigned to Lightning Creek tributaries). Thirty Bull Trout were transported to Region 3, including 3 released in the Vermilion River and 27 released in Graves Creek. Two Bull Trout were transported to Region 4 of which one was released in the Thompson River and one was released in the Jocko River.

As part of the CGFPF M&E Plan, five 3' circular PIT antennas were deployed in the lower Clark Fork River to provide information on Bull Trout presence downstream of Cabinet Gorge Dam.

These antennas were deployed in March and operated through early November. A total of 62 Montana-origin Bull Trout were detected downstream of Cabinet Gorge Dam in 2025. Forty-six (74%) of these fish were detected on PIT antennas at the CGFPF and 10 (16%) of these fish were captured in the CGFPF. Thirty-six (58%) of the known 62 Montana-origin Bull Trout detected at any point before capture, were captured in the CGFPF or CGH Ladder Trap.

*Westslope Cutthroat Trout Experimental Transport:*

The management goal for Westslope Cutthroat Trout passage is to reestablish connectivity and increase the number of large migratory Westslope Cutthroat Trout available to spawn in Montana tributaries. This was the eleventh year Westslope Cutthroat Trout were captured downstream of Cabinet Gorge Dam and transported upstream to Cabinet Gorge Reservoir. The CGFPF was utilized to capture 16 fish for upstream transport. Fish were transported upstream from mid-April through mid-June and were released near Bull River Bay in Cabinet Gorge Reservoir. Four fish were detected entering the Bull River drainage during the spring spawning time period and six were detected on PIT antennas below Noxon Rapids Dam.

A project was initiated in 2022 to evaluate the reproductive success of Westslope Cutthroat Trout transported upstream of Cabinet Gorge Dam. Genetic fin tissue samples were collected from juvenile and adult Westslope Cutthroat Trout captured during electrofishing and hook-and-line sampling efforts in the Bull River drainage. These genetic samples were shipped to a genetics lab for analysis to determine if any of those fish are offspring of a Westslope Cutthroat Trout transported upstream of Cabinet Gorge Dam in previous years. The results of this analysis are available in a project completion report. Results from the analysis have shown successful reproduction of Westslope Cutthroat Trout transported upstream of Cabinet Gorge Dam over multiple years.

*Noxon Rapids Dam Permanent Fishway:*

Under Amendment No. 1 to the CFSA, final design and construction of the Noxon Rapids Dam Permanent Fishway shall be deferred for an interim period ending no sooner than December 31, 2021. In 2025, the third full year of CGFPF operation and ongoing refinement of juvenile Bull Trout capture and transport, discussion of a Noxon Rapids Dam fish collection facility was not resumed. The CGFPF subgroup agreed the next step is compiling data on Bull Trout presence below Noxon Rapids Dam to assess fish passage needs. Avista compiled a list of available data to share with the CGFPF subgroup to identify additional information of interest. Three submersible circular PIT antennas were deployed downstream of Noxon Rapids Dam from April to November to learn more about fish presence below Noxon Rapids Dam. No Bull Trout were detected.

*Downstream Fish Passage:*

Safe downstream passage of Bull Trout is addressed through the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program. Under this program, juvenile Bull Trout are captured in traps during their outmigrations, or through targeted stream electrofishing efforts. Following capture, juvenile Bull Trout are measured, implanted with a PIT tag, and transported to the Clark Fork River downstream of Cabinet Gorge Dam where they are released. In addition, adult Bull Trout that were previously transported upstream and are recaptured in tributaries following the spawn are transported back to the Clark Fork River downstream of Cabinet Gorge

Dam.

Fish trapping and transport for 2025 was conducted from March 31 through June 29 and September 2 through November 26 in Graves Creek. The East Fork Bull River was trapped from September 2 through November 13. A rain-on-snow event beginning the night of November 13 disabled weir traps and they did not become operational before they were removed on November 24. East Fork Bull River stream electrofishing was conducted during five days from October 21 through November 10. However, a wildfire in the East Fork Bull River drainage limited crew access to areas of greater juvenile Bull Trout density. Vermilion River electrofishing occurred on eight days from October 28 through November 11.

There were a total of 403 capture events of 403 individual juvenile (i.e., <300 mm) Bull Trout during 2025. A total of 337, 120–300 mm, Bull Trout were captured in Montana tributaries and transported to Idaho during 2025 (Table 1). An additional 65 juvenile Bull Trout were captured and released on site because they did not meet one or more of the transport criteria (i.e., fish length or direction of travel). There was one juvenile Bull Trout mortality observed in 2025. The mortality was caused by injury sustained during electrofishing capture. Following capture, fish were measured (length and weight) and implanted with a PIT tag if they were greater than 99 mm and if a PIT tag was not already present. All juvenile transports were released in the lower Clark Fork River at the Cabinet Gorge Fish Hatchery site.

In Graves Creek there were 29 capture events of 28 individual adult Bull Trout during 2025. Twenty-two of these individuals were transported back to the Clark Fork River downstream of Cabinet Gorge Dam (includes a within-year recapture that was previously captured and released onsite), two were released onsite, and four were mortalities.

**Table 1.** Tributary and method of capture for juvenile Bull Trout transported to Idaho under the Tributary Trapping and Downstream Juvenile Bull Trout Transport Program in 2025.

<b>Tributary</b>	<b>Method</b>	<b>Bull Trout Transported</b>
Graves Creek	Permanent Weir	301
East Fork Bull River	Weir/Stream Electrofishing	11
Vermilion River	Stream Electrofishing	25
Total		337

Following a feasibility investigation, Avista constructed a concrete-bedded weir trap (permanent weir trap) on lower Graves Creek in late 2012 and initiated operation in 2013. Operation of the permanent weir trap was anticipated to facilitate higher capture efficiencies for outmigrating juvenile Bull Trout, particularly during periods of higher streamflow that proved difficult to trap with existing methodologies. The Graves Creek Permanent Weir Trap Monitoring and Evaluation Plan was completed in 2013 and was designed to evaluate the operation and fish capture effectiveness of the permanent weir trap. The plan was updated during 2017 and continues to be implemented.

From the inception of permanent weir operation through 2018, a number of issues were identified and iteratively addressed by Avista, MFWP, and USFWS. After careful consideration and extensive testing of a prototype, an engineering firm was hired to design substantial enhancements to the permanent weir trap. Design was finalized in 2020 and construction of the enhancements occurred in the summer and fall of 2021. The enhancements became operational on November 3, 2021 and preliminary results suggest the new trap meets and exceeds the various goals and expectations that warranted the change. In addition, due to the marked increase in the number of juvenile Bull Trout being handled during 2019 and 2020, Avista constructed a fish handling facility near the permanent weir trap that also became operational in 2021. This facility provides protected, flow-through stream water to minimize stress while holding and working up fish prior to transport or release. Avista continues to adaptively manage and iteratively improve the trap in consultation with the USFWS.

### **8.2.2.2 Prescription 2 Conditions and Corresponding Activities**

#### ***Prescription 2 Description***

USFWS's Section 18 Prescription 2 states the following:

*At the effective date of the Settlement Agreement (License Application Volume III), the licensee shall develop and implement a fish passage program in accordance with the terms of the Clark Fork Settlement Agreement and the Native Salmonid Restoration Plan (License Application Volume IV.A). Implementation of the Plan shall include initial project scoping activities resulting in goals and objectives; background information, compilation and updating in areas of fish genetics, fish pathogens, exotic fish control, existing fish populations, stream and mainstem habitat conditions; assessment of suitable fish stock availability, fish transfer options, and fish hatchery options; and implementation of experimental and comprehensive fish passage measures, as appropriate, and a monitoring program to assess the effectiveness of fishways and other measures.*

#### ***2025 Activities Associated with Prescription 2***

Avista continued to provide safe, timely, and effective fish passage in 2025, adaptively managed in consultation with USFWS and other MC members. As part of the fish passage program, CFSA stakeholders developed a NSRP Five-Year Plan to guide decisions related to fish passage. The plan is updated every five years. During the drafting of the most recent plan, the MC approved expanding the scope to include all aquatic PM&Es (i.e., including implementation history and future strategies for CFSA appendices D, E, F1–4, and T; in addition to the existing appendices A, B, C, and F5). The updated NSRP Five-Year Plan (five-year plan for all aquatic PM&E measures) for the 2026–2030 time period will be presented to the MC for approval at the March 17, 2026, MC meeting. In 2025, the USFWS also reviewed and approved AIPs, including those related to Bull Trout passage. The pertinent project plans include:

- Upstream Fish Passage Program
- Westslope Cutthroat Trout Transport Evaluation
- Tributary Trapping and Downstream Juvenile Bull Trout Transport Program

- Clark Fork Settlement Agreement Aquatic Protection, Mitigation, and Enhancement Measures Five-Year Plan (2026-2030)
- Redd Surveys in Montana Tributaries
- Habitat Restoration Monitoring and Native Salmonid Abundance Monitoring Plan
- Lower Clark Fork Bull Trout Life History Evaluation
- Graves Creek Bull Trout Translocation Project

Assessing and/or improving stream and mainstem habitat conditions and the implementation of a monitoring program to assess the effectiveness of fishways and other measures are activities addressed through the coordinated implementation of CFSA appendices A, B, C, and F5.

### 8.2.3 Key 2025 References

Adams, B., A. Parks, and J. VonBargen. 2025. Genetic Analysis of Native Salmonids from the Lake Pend Oreille and Clark Fork River System, Idaho and Montana. 2024 Annual Project Update. Avista document identification number 2025-0222.

Aquatic Implementation Team. 2026. Clark Fork Settlement Agreement Aquatic Protection, Mitigation, and Enhancement Measures Five Year Plan (2026-2030). Avista document identification number 2026-0007

Avista. 2025. Clark Fork Project, FERC Project No. 2058, Biological Opinion Condition 25, Report Regarding Cabinet Gorge Fish Passage Facility Shutdown (June 12, 2025). FERC Submittal. Avista document identification number 2025-0117.

Avista. 2025. Clark Fork Settlement Agreement Management Committee Meeting Record from September 23, 2025. Avista document identification number 2025-0264.

Avista. 2025. Report Regarding Cabinet Gorge Fish Passage Facility Shutdown (July 7, 2025). FERC Submittal. Avista document identification number 2025-0117.

Bass, W. and S. Bernall. 2025. Cabinet Gorge Fish Passage Facility Monitoring and Evaluation Plan Year 2 Update. 2024 Annual Project Update. Avista document identification number 2025-0280.

Bernall, S. 2025. Appendix C Fish Passage/Native Salmonid Restoration Plan. 2025 Annual Work Summary. Avista document identification number 2025-0289.

FERC. 2000. Order Issuing New License for Clark Fork Project No. 2058, effective date March 1, 2001. Avista document identification number 2000-0047.

FERC. 2019. Order Amending License and Approving Exhibits A and F (August 8, 2019). Avista document identification number 2019-0175.

FERC. 2025. Order Approving 2024 Annual Report and 2025 Implementation Plans Per Article 402, Annual Threatened and Endangered Species Plan Per Article 432, and Annual Fishway Plan Per Article 433 (December 5, 2025). FERC Order. Avista document

identification number 2025-0225.

USFWS. 2019. Endangered Species Act Section 7 Consultation Biological Opinion. Avista document identification number 2019-0026.

### 8.3 Other Clark Fork License Articles

#### 8.3.1 Purpose

This section of the Annual Report highlights any annual activities (Section 8.3.2) that occurred in 2025 associated with other License Articles for the Clark Fork Project No. 2058 that do not directly tie to a specific CFSA PM&E measure.

#### 8.3.2 2025 Activity Table

License Article Number	License Article Description	Activity
438	Dispute Resolution	No activity occurred
439	Rock Creek Mine Discharge Facility	No activity occurred
440	Revised License Exhibit G	No activity occurred
441	Alterations per Fish and Wildlife Program	No activity occurred
442	Permission for Use and Occupancy of Project Lands and Waters	See Section 8.3.2.1
443	Construction, Operation, and Maintenance of Fishways	See Section 8.2.2.1

##### 8.3.2.1 Permission for Use and Occupancy of Project Lands and Waters

In 2025, Avista granted permission for certain, allowable types of use and occupancy of Project lands and waters to comply with CFSA appendices G and H (License Articles 414 and 415). Uses and occupancy information is included in sections 7.1 and 7.2 of this report. Avista conveyed no new easements in 2025.

#### 8.3.3 Key 2025 References

Avista. 2025. Appendix G Land Use Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0290.

Avista. 2025. Appendix H Implementation of the Recreation Resource Management Plan. 2025 Annual Work Summary. Avista document identification number 2025-0291.

## Section 9: FERC Submittals and Actions

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### 9.1 Purpose

The purpose of this section is to provide a succinct record of the 2025 submittals under the Clark Fork License No. 2058 and any items requiring FERC action through December 31, 2025. The FERC-related activities for 2025 (such as FERC filings, FERC orders, and FERC correspondence), and FERC awareness items (such as Clark Fork Settlement Agreement PM&E measure modifications and clarifications and specific issues of interest) are included in this section of the Annual Report.

### 9.2 FERC Activities/Awareness

In 2025, FERC activities related to the Clark Fork Project included the following:

- FERC’s February 21, 2025 Order Approving 2023 Annual Report and 2024 Annual Implementation Plans Per Article 402, Annual Threatened and Endangered Species Plan Per Article 432, and Annual Fishway Plan Per Article 433.
- Avista’s April 7, 2025 submittal of the 2024 Clark Fork Annual Report and the 2025 Clark Fork Annual Implementation Plans.
- Avista’s July 7, 2025 submittal of Report of Cabinet Gorge Dam Fish Passage Facility June 12, 2025 Shutdown.
- Avista’s October 30, 2025 submittal of a Biological Opinion Condition 20 Report regarding three Bull Trout mortalities for October 2025.
- Avista’s November 24, 2025 submittal of a Biological Opinion Condition 20 Report regarding two Bull Trout mortalities for October 2025.
- FERC’s December 5, 2025 Order Approving 2024 Annual Report and 2025 Annual Implementation Plans Per Article 402, Annual Threatened and Endangered Species Plan Per Article 432, and Annual Fishway Plan Per Article 433.

### 9.3 Key 2025 References

FERC. 2025. Order Approving 2023 Annual Report and 2024 Implementation Plans Per Article 402, Annual Threatened and Endangered Species Plan Per Article 432, and Annual Fishway Plan Per Article 433 (February 21, 2025). FERC Order. Avista document identification number 2025-0033.

Avista. 2025. 2024 Clark Fork Annual Report and 2025 Clark Fork Annual Implementation Plans (April 7, 2025). FERC Submittal. Avista document identification number 2025-0057.

Avista. 2025. Report Regarding Cabinet Gorge Fish Passage Facility Shutdown (July 7, 2025). FERC Submittal. Avista document identification number 2025-0117.

Avista. 2025. Biological Opinion Condition 20 Report Regarding Bull Trout (October 30, 2025). FERC Submittal. Avista document identification number 2025-0203.

Avista. 2025. Biological Opinion Condition 20 Report Regarding Bull Trout (November 24, 2025). FERC Submittal. Avista document identification number 2025-0217.

FERC. 2025. Order Approving 2024 Annual Report and 2025 Implementation Plans Per Article 402, Annual Threatened and Endangered Species Plan Per Article 432, and Annual Fishway Plan Per Article 433 (December 5, 2025). FERC Order. Avista document identification number 2025-0225.

## Section 10: Amendments, Modifications, and Clarification of License Articles

### 10.1 Purpose

This portion of the Annual Report highlights and summarizes all amendments, modifications, and/or clarifications (other than one-time filing extensions or Exhibits and annual approvals) made to the License for Clark Fork Project No. 2058, through December 31, 2025. Note that terms and conditions of the original license took effect on March 1, 2001.

Each FERC amendment, modification, or clarification to/of an existing license article are included in Section 10.2. The date of each amendment, modification, or clarification is also documented. There were no activities in 2025.

### 10.2 Amendments/Modifications/Clarifications of License Articles for Clark Fork Project No. 2058

Article Number	Description	Date Amended or Clarified
L-2	Exhibit Drawings	10/29/2013
201	Authorized Installed Capacity and Annual Charges	07/13/2006
201	Authorized Installed Capacity and Annual Charges	10/10/2006
201	Annual Charges and Exhibit A	06/15/2007
201	Authorized Installed Capacity and Annual Charges	04/10/2008
201	Exhibit G Drawings and Annual Charges	02/10/2009
201	Exhibit G Drawings and Annual Charges	10/09/2014
204	Exhibit F and Exhibit G Drawings	01/09/2002
406	Cabinet Gorge Dam Fishway Operations Plan	01/30/2023
412	Water Quality Protection and Monitoring Plan	12/10/2002
412	Water Quality Protection and Monitoring Plan	06/23/2011
413	Exhibit F Drawings	11/18/2016
413	Exhibit F Drawings	03/01/2018
413	Exhibit A and Exhibit F Drawings	08/08/2019
413	Exhibit A and Exhibit F Drawings	06/06/2023
427	Programmatic Agreement	10/30/2000
429	Minimum Flows	12/18/2017
431	Coordination of Flows with Albeni Falls	11/22/2002
432	Threatened and Endangered Species Plan	06/13/2003
433	Fishway Plan	06/13/2003
434	Erosion Plan	03/04/2003
435	Solid Waste and Waste Water Plan	12/10/2002
436	Oil and Hazardous Substance Plan	12/10/2002
437	Pesticide & Herbicide Use Plan	11/22/2002
438	Dispute Resolution	10/30/2000
438	Dispute Resolution	11/22/2002
442	Use and Occupancy of Project Lands and Waters	11/22/2002

<b>Article Number</b>	<b>Description</b>	<b>Date Amended or Clarified</b>
443	Fishway Prescriptions	10/30/2000
n/a	Approval to Replace Transmission Lines	03/05/2014

## Section 11: Clarifications and Modifications to Clark Fork Settlement Agreement and PM&E Measures

### 11.1 Purpose

This portion of the Annual Report highlights and summarizes all clarifications and modifications to the CFSA and PM&E measures.

Each clarification or modification document are included in Section 11.2, with the date of MC (or, in the case of the Programmatic Agreement, CRMG) approval. There were no activities in 2025.

### 11.2 Clarifications/Modifications to Clark Fork Settlement Agreement and PM&E Measures

Document or Appendix	Document Title	Date Approved
CFSA ¶ 26	Cost Over-Run Guidelines	09/27/2000
CFSA ¶ 26	Management Committee Membership Application	12/29/2000
CFSA ¶ 26	Management Committee Procedures	09/30/2003
CFSA	Amendment No. 1	09/26/2017
CFSA Appendix C	Clarification of Usage of Funding Sources	09/30/2003
CFSA Appendix C	Joint Agreement Regarding Fish Passage	03/16/2010
CFSA Appendix C	Resolution of O&M Funding for CGDF	09/26/2017
CFSA Appendix F1	Title Revised	10/26/2016
CFSA Appendix F2	Obligation Fulfilled	09/25/2024
CFSA Appendix N1	Obligation Fulfilled	10/26/2016
CFSA Appendix N2	Obligation Fulfilled	10/26/2016
CFSA Appendix N3	Obligation Fulfilled	10/26/2016
CFSA Appendix O	Obligation Fulfilled	10/26/2016
CFSA Appendix T	Project Operations during Low Inflows	09/26/2001
CFSA Appendix V	Guidelines for Acquisition of Land Interests	03/26/2010
PA	Programmatic Agreement (CRMG) Reporting	04/12/2001
PA	Programmatic Agreement (CRMG) Reporting	11/23/2004

## Section 12: Annual Budget and Grant Summary

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### 12.1 Budget Summary

On the following page is a spreadsheet summary of budget activities for each of the PM&E measures for the 2025 calendar year (i.e., January through December). The MC-approved activity year is from April through March; therefore, the following budget spreadsheet summary includes the fourth quarter of 2024 approved activities and the first through third quarters of the 2025 approved activities.

The “2024 Carryover Funding w/INT” column in the budget spreadsheet shows funding obligations carried over from 2024 (4.19% interest). Total carryover was \$17,308,810.

The “2025 Contribution w/GDP” column, totaling \$5,870,804, details Avista’s annual funding obligation per Appendix U (Funding Summary Table) of the CFSA plus an additional \$105,979 “GDP” (Gross Domestic Product) escalation for inflation (2.20%) under terms of Paragraph 23 of the CFSA.

The “Total Funding Obligation” column is the sum of the “2024 Carryover Funding” column and the “2025 Contribution w/GDP” column. For 2025, the “Total Funding Obligation” was \$22,426,062. Note the MC approved the removal of CFSA appendices F2, N1, N2, N3, and O from the ongoing list of CFSA PM&E measures, as Avista has met the obligation under these appendices for the remainder of the current FERC license.

The “2025 Annual Implementation Plan Budget” column, totaling \$8,163,399, shows the implementation budget amounts determined by the TRTAC and WRTAC and approved by the MC. Note that, due to TRTAC, WRTAC, and MC decisions, some 2025 AIP budgets were more or less than the actual 2025 “Total Funding Obligations”.

The “Total 2025 Expenditures” column shows expenditures for each of the PM&E measures, totaling \$3,757,562.

The “Unspent Dollars” column shows the amount of unspent dollars for certain annual funding obligations totaling \$19,478,869. In 2012, expenditures from CFSA Appendix C (Annual Facilities Obligation) Fund exceeded the annual obligation and all carryover dollars were depleted. Since then the dollar amounts represented in the “Appendix C Facilities” row have been represented as negative amounts. The negative amounts accurately reflect the expenditures above and beyond the sum of annual contributions to date.

Under terms of Paragraph 23 of the CFSA, the Treasury constant maturity 1-year, (3.48% for 2025) is added to the unspent dollars noted as “Fund” or “Budgeted” and equates to an additional \$506,048. The final column on the spreadsheet is the “2025 Carryover Funding w/INT”. Total 2025 end-of-year carryover, plus interest, is \$19,633,565.

**Avista CFSA Annual Budget Report 2025  
Year Twenty-Seven of CFSA**

App.	PM&E Funds	2024	Notes	Fund	2025	Total	2025 Annual	Budget Additions	2025	Expenditure Notes	Unspent Dollars	2025
		Carryover Funding w/INT			Contribution w/GDP	Funding Obligation	Implementation Plan Budget		Total 2025 Expenditures			Carryover Funding w/INT
A	ID Trib. Habitat, Acquisition & Fishery Enhance Prgm											
	Tributary Habitat Acquisition & Enhancement	\$2,445,801	1	Fund	\$697,478	\$3,143,278	\$205,246		\$63,735	1	\$3,014,071	\$3,118,960
	Fishery Resource Monitoring, Enhancement & Mgmt	\$0	1	Budgeted	\$60,220	\$60,220	\$122,000		\$125,693	1	\$0	\$0
B	MT Trib. Habitat Acquisition & Rec. Fish Enhance											
	Tributary Habitat Acquisition & Enhancement	\$3,307,996		Fund	\$496,954	\$3,804,950	\$531,122	1	\$174,087		\$3,630,863	\$3,757,217
	Recreational Fishery Enhancement	\$2,002,054		Fund	\$331,299	\$2,333,353	\$373,597	1	\$108,743		\$2,224,610	\$2,302,027
C	Fish Passage/Native Salmonid Restoration Plan											
	Annual Operations	\$1,325,912		Budgeted	\$960,774	\$2,286,686	\$2,109,037		\$1,301,892		\$984,794	\$1,019,065
	Facilities	-\$40,399,545	2	Fund	\$697,480	-\$39,702,065	\$0		-\$2,992		-\$39,699,073	-\$41,080,600
	Cabinet Minor Modifications	\$863,182	3	Other		\$863,182	\$863,182	2	\$233,157		\$630,025	\$630,025
D	Bull Trout Protection & Public Education Project	\$333,878		Budgeted	\$215,057	\$548,935	\$252,540		\$77,697		\$471,238	\$487,637
E	Watershed Council Program	\$20,000	4	Budgeted	\$17,204	\$37,204	\$17,249		\$13,854		\$23,350	\$20,000
F1	Clark Fork River Water Quality Monitoring Program											
	Annual Monitoring	\$16,245		Budgeted	\$25,808	\$42,054	\$37,209		\$30,700		\$11,354	\$11,749
	5yr intensive monitoring	\$10,000	5	Periodic		\$10,000	\$10,000		\$10,000		\$0	\$0
F3	Aquatic Organism Tissue Analysis	\$0	6	Periodic	\$15,000	\$15,000	\$0		\$0		\$15,000	\$15,000
F4	Water Quality Protection & Monitoring Plan		7				\$0					
F5	Dissolved Gas Supersaturation Control, Mit. & Mon.											
	Section 3.1 Funding	\$285,215		Fund	\$706,596	\$991,811	\$991,811		\$974,192		\$17,619	\$18,232
	Section 3.2 Funding	\$2,797,836	8	Other	\$932,612	\$3,730,448	\$583,689		\$0		\$3,730,448	\$3,730,448
G	Land Use Management Plan (LUMP)			Estimated			\$246,200		\$184,656		\$61,544	
H	Recreation Resource Mgmt Plan (RRMP)											
	Management Fund			Estimated			\$438,661		\$216,338		\$222,323	
	Facilities Fund	\$757,796		Fund	\$265,999	\$1,023,795	\$1,018,065		\$102,766		\$921,029	\$953,081
I	Aesthetics Management Plan			Estimated			\$12,000		\$0		\$12,000	
J	Wildlife, Botanical, & Wetland Management Plan			Estimated			\$5,000		\$0		\$5,000	
K	Wildlife Habitat Acquisition, Enhancement, & Mgmt	\$1,884,155		Fund	\$346,507	\$2,230,662	\$124,101		\$52,470		\$2,178,192	\$2,253,993
L	Black Cottonwood Habitat Protection & Enhancement	\$99,181		Budgeted	\$4,937	\$104,118	\$20,000		\$3,043		\$101,076	\$104,593
M	Wetlands Protection & Enhancement Program	\$741,934		Budgeted	\$32,104	\$774,039	\$4,199		\$2,859		\$771,179	\$798,016
P	Forest Habitat Protection & Enhancement	\$226,328	9	Other		\$226,328	\$27,991		\$11,720		\$214,607	\$214,607
Q	Reservoir Islands Protection		10				\$0					
R	Clark Fork Heritage Resource Program			Estimated			\$111,500		\$65,177		\$46,323	
S	Erosion Fund & Shoreline Stabilization Guidelines	\$191,297	11	Fund	\$64,775	\$200,000	\$59,000		\$7,775		\$192,225	\$198,914
T	Project Operations Package		12	Other			\$0		\$0		\$0	
	<b>Total</b>	<b>\$17,308,810</b>	<b>13</b>		<b>\$5,870,804</b>	<b>\$22,426,062</b>	<b>\$8,163,399</b>		<b>\$3,757,562</b>		<b>\$19,478,869</b>	<b>\$19,633,565</b>

## NOTES

- 1 In 2019, the MC approved the funding obligation for App A (Fish Resource Monitoring, Enhancement, and Management Fund) be permanently increased to \$96,000. The additional funding will continue to be transferred from the Tributary Habitat Acquisition and Enhancement Fund. The transfer will occur at the end of the year when actual expenditures are finalized. The actual amount transferred will be the difference between actual expenditures and the annual contribution.
- 2 Negative figures represent the amount that Avista has spent in excess of the sum of the annual contributions to date. Pursuant to the CFSA, Avista will fund the actual cost of permanent fish passage facility construction in the event the Facilities budget is not adequate.
- 3 The Cabinet Minor Modifications fund is a one-time commitment of up to \$938,751 made available beginning in 2023 and not subject to GDP inflation or interest.
- 4 Pursuant to the CFSA, carryover funding with interest in any one year shall not exceed \$20,000.
- 5 The Appendix F1 periodic contribution is made available once every five years. This funding is for a private sector consultant to assist in evaluating the monitoring results. For the current 5-year period (2023-2027), this money was made available through the 2022 AIP process so that work could commence in early 2023.
- 6 Avista will pay the actual costs in an amount not to exceed \$15,000 during any five-year period, as defined in the CFSA. The \$15,000 for the current five-year cycle (2025-2029) was first made available in 2025.
- 7 Cost associated with monitoring and best management practices implementation will be borne by Avista.
- 8 Section 3.2 funding refers to the funding mechanism defined in Section 3.2 of the Phase III agreement. The annual contribution associated with this funding is not subject GDP inflation and unexpended funds are not subjected to interest. Pursuant to the Phase III agreement, all appendix F5 project will be funded through Section 3.1. If the "Total Funding Obligation" Section 3.1 funds are exceeded during any given year, the balance will be funded through Section 3.2 funding.
- 9 Cost associated with implementing projects are generally funded by Timber Sale Revenue. Pursuant to the CFSA, some costs are covered through administration of the Land Use Management Plan (Appendix G).
- 10 Pursuant to the CFSA, costs associated with Reservoir Islands Protection are covered through administration of the Land Use Management Plan (Appendix G).
- 11 Annual contributions of \$40k plus GDP inflation are contributed to this fund until reaching the \$200k cap.
- 12 Cost associated with Project Operations and Coordination will be borne by Avista.
- 13 Appendix C Facilities balances were removed from Total Funding Obligation, Unspent Dollars, and Carryover Funding w/INT totals because expenditures to date have greatly exceeded the sum of the annual contributions to date.

## FUND

- Fund Refers to dollars that are made available annually. These funds are adjusted annually by the percentage change of the GDP-IDP as reported by the Bureau of Economic Analysis. Unused funds are carried forward to the next year and increased by the yield in percent as reported in the Federal Reserve Statistical Release H-15 of US treasury securities as a constant maturity.
- Estimated Refers to dollars that are projections made now however; Avista will pay the actual costs of implementation. Unused funds are not carried forward to the next year.
- Budgeted Refers to dollars that support initiatives within programs that are the responsibility of other parties. Avista will pay the actual costs in an amount not to exceed the agreed budget. Unused funds are carried forward to the next year and increased by the yield in percent as reported in the Federal Reserve Statistical Release H-15 of the US treasury securities as a constant maturity.
- Periodic Refers to dollars that are periodic or a one-time cost. Avista will pay the actual costs in an amount not to exceed the specified budget.

## BUDGET ADDITIONS

- 1 Appendix B consent mails for \$250k funding for Stimson Conservation Easement (7/10/25) 50:50 split between the two funds within Appendix B. The Management Committee delegated spending authority for the remaining balance of the Minor Modifications Fund (i.e., \$438,751) to the Cabinet Gorge Fish Passage
- 2 Facility Subgroup during the 2025 fall meeting.

## EXPENDITURE NOTES

- 1 Management Committee approved a transfer from the Tributary Habitat Acquisition & Enhancement Fund to the Fish Resource Monitoring, Enhancement, and Management Fund of \$61,780 for 2025. A transfer of \$65,473 was made, which covered the expenditure overage of \$3,693.

## 12.2 Grant Summary

Appendices B and H of the CFSA included a provision intended to leverage PM&E measure funds through grants. Avista has employed a grant writer who pursues creative funding opportunities to match and enhance the financial commitments being made to implement the PM&E measures. It is important to note that any funding received does not reduce Avista’s contribution to the implementation effort; rather, the funds create additional protection, mitigation, and enhancement opportunities.

The grant writer coordinates with program leaders, technical committees, MC members and other local constituencies to identify projects for grant funding, research funding sources, prepare grant applications, and conduct grant project follow-up and reporting.

In 2025, the grant writing team secured \$441,903 in grants for a variety of projects. Grant requests for \$44,300 remained pending at the end of 2025 (Table 1). Since inception of the grant writing program in 1999, a total of \$14,827,701 in federal, state, and private foundation grants have been acquired to assist with implementation of a wide range of on-the-ground aquatic and terrestrial projects.

### *Grants received in 2025 helped initiate or carry out the following projects:*

#### Vermilion River Restoration Projects 4 through 6, Survey and Design

In 2025, the Lower Clark Fork Watershed Group (LCFWG) was awarded two grants, totaling \$100,800, to help cover expenses for design and restoration of the Rocker Reach, and design of the 100 Ton Reach in the Vermilion River, a critical Bull Trout and Westslope Cutthroat Trout tributary to the Lower Clark Fork River in Sanders County. One grant, for \$50,000, was from the Montana Department of Natural Resources and Conservation Watershed Management Grant program. The other grant was a private grant awarded by Phillips 66 for \$50,800. The two grants also were needed as non-federal match required to ultimately secure a \$662,751 federal grant awarded in 2024 from the National Fish and Wildlife Foundation’s America the Beautiful Challenge grant program for the Vermilion River project.



#### Priest River Watershed Group Restoration Planning

Trout Unlimited secured a \$299,668 grant through the Bureau of Reclamation WaterSMART Cooperative Watershed Management Program to advance collaboration, communication, and planning for water quality solutions in the Priest River watershed. The funds are intended to enable the Priest River Watershed Group (PRWG) to support and enhance the native cold-water fishery and water quality in the Lower Priest River Watershed by improving human connection to the

Lower Priest River through education and outreach; completing a watershed restoration plan for the East River, a critical tributary to the Lower Priest River; and developing broad scientific understanding of the Lower Priest River watershed. This award follows on a 2022 WaterSMART Cooperative Watershed Management Program grant that established the PRWG. This second round of funding will allow the PRWG to continue building the organization and initiate restoration planning for the Lower Priest River Basin. No match funding was required.

#### Managing Aquatic Invasive Plants on Noxon and Cabinet Gorge Reservoirs

A \$21,285 grant was awarded to Sanders County from Montana's Aquatic Invasive Species Council for continuation of the Eurasian Watermilfoil (EWM) control program in Noxon and Cabinet Gorge reservoirs. The overall program budget was \$71,810, which included control of EWM through herbicides, education and outreach, and facilitation of the Sanders County Aquatic Plant Task Force and administration of the program. The grant funds were used to fund the control measures, while \$23,936.60 in CFSA funds contributed to control measures and program management. Other in-kind match was provided by members of the Sanders County Aquatic Plant Task Force and the Scientific Advisory Panel.

#### Scenic Bay Cleanup

The Lake Pend Oreille Idaho Club (LPOIC) is undertaking an ambitious plan to clean up the lakebed of Scenic Bay, where the community of Bayview is located. The bay is full of marinas, as well as home of a U.S. Navy research detachment. The lakebed below the marinas around is littered with drums, tires, old appliances, and other heavy debris. The area is an important area for spawning kokanee, a key food source for Bull Trout. The clean-up is expected to take multiple years, and this summer the club secured a \$10,250 Idaho Community Foundation grant to help fund a one-day clean-up in the spring of 2026.

#### Watershed Improvements Planning on the Kootenai and Lolo National Forests

The LCFWG was awarded \$9,900 from the National Forest Foundation's Collaborative Capacity Mini-Grant program to further planning efforts on and adjacent to national forest lands in the watershed and increase engagement and involvement of the Kalispel Tribe and Confederated Salish and Kootenai Tribes in those planning efforts. Specifically, the funding is intended to assist with facilitating collaborative planning work over the next two years in the East Fork Bull and Bull rivers and the Vermilion River in the Kootenai National Forest and the Thompson River and Prospect Creek watersheds in the Lolo National Forest. Match for this work was provided through appendices B and E.

#### ***Grants pending at the end of the year:***

#### Managing Aquatic Invasive Plants on Noxon and Cabinet Gorge Reservoirs

Sanders County applied for \$40,000 from Montana's Aquatic Invasive Species Council to continue the EWM control program in Noxon and Cabinet Gorge reservoirs in 2026. Match funding in the amount of \$50,225 is provided by the CFSA through EWM management program under appendices B and G.

Scenic Bay Cleanup

The LPOIC also applied for \$4,300 from the Kalispel Charitable Foundation to help fund the spring cleanup of Scenic Bay lakebed, as described above. The overall cost of the spring cleanup is estimated to be \$16,550, and as of the end of 2025 not all funds had been secured.

**Table 1.** Grant summary report.

<b>2025 GRANTS SUMMARY</b>			
<b>GRANTS RECEIVED IN 2025</b>			
<b>AMOUNT</b>	<b>PROJECT</b>	<b>SPONSOR</b>	<b>FUNDER</b>
\$50,000	Vermilion River Restoration	LCFWG	DNRC WMG
\$50,800	Vermilion River Restoration	LCFWG	Phillips 66
\$299,668	PRWG Restoration Planning	Trout Unlimited	BOR WaterSMART
\$21,285	Managing AIS in Reservoirs	Sanders County	DNRC
\$10,250	Scenic Bay Cleanup	LPOIC	Idaho Community Fdn
\$9,900	Project Planning/Coordination	LCFWG	National Forest Fdn
<b>\$441,903</b>	<b>TOTAL RECEIVED IN 2025</b>		
<b>GRANTS PENDING AT YEAR'S END</b>			
\$40,000	Managing AIS in Reservoirs	Sanders County	DNRC
\$4,300	Scenic Bay Cleanup	LPOIC	Kalispel Tribe
<b>\$44,300</b>	<b>TOTAL PENDING</b>		
<b>GRANTS NOT RECEIVED IN 2025</b>			
\$12,600	Grouse Reach Revegetation	LCFWG	Charlotte Martin Fdn
\$300,000	North Shore Site Improvements	Avista	MT Pilot Community Tourism Program GP
<b>\$312,600</b>	<b>TOTAL NOT RECEIVED 2025</b>		