

AVISTA CORPORATION

LAKE SPOKANE AND NINE MILE RESERVOIR 2015 AQUATIC WEED SUMMARY REPORT

SPOKANE RIVER LICENSE APPENDIX B
WASHINGTON 401 CERTIFICATION SECTION 5.3(E)

SPOKANE RIVER HYDROELECTRIC PROJECT
FERC PROJECT NO. 2545

Prepared By:
Avista Corporation

February 29, 2016

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1.0 INTRODUCTION

This Lake Spokane Aquatic Weed Summary Report (Report) summarizes aquatic weed management efforts that Avista Corporation (Avista) implemented in 2015 in accordance with the Lake Spokane Aquatic Weed Management Program (AWMP) (Avista, 2010). These efforts included site-specific aquatic weed herbicide treatments in Lake Spokane, flowering rush (*Butomus umbellatus*) control in Lake Spokane and Nine Mile Reservoir, winter drawdown monitoring, and educational and public outreach activities. Treatment and monitoring locations discussed in this report are identified on Figure 1.

In order to effectively implement the AWMP Avista coordinates its weed control activities with the Washington Department of Ecology (Ecology), the Washington Department of Fish and Wildlife (WDFW), the Washington Department of Natural Resources (WDNR), the Washington Parks and Recreation Commission (State Parks), Stevens County Conservation District, Stevens County Noxious Weed Control Board, Spokane County Conservation District, Spokane County Noxious Weed Control Board, Lincoln County Weed Control Board, and the Lake Spokane Association (collectively referred to as the “Cooperating Parties”).

1.1 Background

On June 18, 2009, the Federal Energy Regulatory Commission (FERC) issued Avista a License (License) for the Spokane River Hydroelectric Project (Project) for a 50-year license term (FERC, 2009). The Project consists of five hydroelectric developments (HEDs) located on the Spokane River in northern Idaho (Kootenai and Benewah Counties) and eastern Washington (Spokane, Stevens, and Lincoln Counties). The five HEDs, from upstream to downstream, include:

- Post Falls (River Mile [RM] 102.0)
- Upper Falls (RM 74.2)
- Monroe Street (RM 74.0)
- Nine Mile (RM 58.1)
- Long Lake (RM 34.0)

1.2 License Requirements

In 2010, Avista developed the AWMP as required by Ecology’s Section 401 Water Quality Certification (Certification), which is incorporated as Appendix B of the License. As required by the Certification, the AWMP was prepared in consultation with Ecology, WDFW, and WDNR. On January 13, 2011, FERC issued an Order modifying and approving the AWMP pursuant to Article 401(A)(5).

1.3 Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program

The AWMP was developed to control non-native, invasive aquatic weeds in Lake Spokane, a 5,060-acre, 23.5-mile-long reservoir, created by Long Lake Dam at River Mile (RM) 33.9. The

AWMP also includes monitoring for and controlling invasive aquatic weeds in Nine Mile Reservoir, a 440-acre, 6-mile-long reservoir created by Nine Mile Dam (located at RM 58.1). Lake Spokane was surveyed for aquatic weeds in 2000 (TetraTech 2001), in 2007 (AquaTechnex 2007) and again in 2012 (AquaTechnex 2012). The AWMP summarizes the 2000 and 2007 surveys and identifies the following noxious weeds in Lake Spokane: curly-leaf pondweed (*Potamogeton crispus*), Eurasian watermilfoil (milfoil) (*Myriophyllum spicatum*), fragrant waterlily (*Nymphaea odorata*) and yellow floatingheart (*Nymphoides peltata*). Flowering rush (*Butomus umbellatus*) was identified in Lake Spokane in 2010 by Ecology. Additionally, in 2012 Avista identified milfoil and reaffirmed flowering rush in Nine Mile Reservoir. As such, a revised monitoring and control plan was completed and included in the 2013 Summary Report.

The goals of the AWMP are to: (1) reduce invasive aquatic weeds at public and community boat access points, (2) maintain a moderate level of ongoing control of aquatic weeds in areas from 0 to 14 feet in depth through the use of winter drawdowns in Lake Spokane, and (3) support weed control efforts and facilitate coordination among the entities involved in aquatic weed control on Lake Spokane. Elements of this AWMP include:

- Coordinating with Cooperating Parties,
- Implementing site-specific aquatic weed control actions at the primary recreation access points on Lake Spokane,
- Implementing a reservoir-wide winter drawdown for the purpose of aquatic weed control on Lake Spokane,
- Monitoring to evaluate the effectiveness of site-specific aquatic weed control actions and reservoir-wide winter drawdowns,
- Periodic monitoring for invasive, non-native aquatic plants in Nine Mile Reservoir, and
- Preparing an annual report summarizing aquatic weed management activities and their effectiveness.

Avista implements prioritized aquatic weed monitoring and control activities in accordance with the annual Program Task List (List). This List is developed in coordination with the Cooperating Parties on an annual basis. The List includes activities that Avista is directly responsible for and other tasks (i.e. local workshops, conferences, other agreed upon site-specific weed control efforts) that Avista may support. Items on the List include, but are not limited to: education and outreach related to aquatic weed control, monitoring or surveys for aquatic weeds, and site-specific control activities targeting specific public and private lake access points (see Section 2.1).

2.0 2015 PROGRAM TASK LIST IMPLEMENTATION

2.1 Coordination with the Cooperating Parties

On March 3, 2015, Avista held an annual meeting with the Cooperating Parties and presented proposed tasks for 2015. The 2015 List was refined in coordination with the Cooperating Parties and included the following tasks:

- Evaluate the public and community boat launches in Lake Spokane and potential areas of weed infestation in Nine Mile Reservoir for invasive and/or problematic aquatic weeds; delineate herbicide treatment areas where necessary; and conduct pre-treatment surveys.
- Treat up to 20 acres with herbicide treatments on Lake Spokane and Nine Mile Reservoir.
- Conduct pre-drawdown monitoring on Lake Spokane.
- Implement flowering rush control in Lake Spokane and/or Nine Mile Reservoir.

2.2 Aquatic Weed Herbicide Treatments in Lake Spokane

In 2015, Avista completed herbicide treatments to reduce aquatic weeds identified in Section 1.3 at public and community access sites on Lake Spokane. A total of 38.13 acres were treated at the following locations: Nine Mile Recreation Area and boating lane, Lake Ridge Park, Spokane Lake Park, Suncrest Park, West Shore, Willow Bay Resort/Lakeview, Lake Forest and Lakeshore Estates (Figures 1-9).

Avista retained Lakeland Restoration Services (Lakeland) to complete the herbicide applications. A total of 57 gallons of diquat dibromide, a contact herbicide, was applied with a targeted application rate of two gallons per acre foot, along with 70 gallons of Aquathol, with a targeted application rate of 1.9 gallons per acre foot was utilized on June 29, 30 and July 1, 2015. The data collected and recorded on field monitoring sheets is contained in the 2015 Lake Spokane Herbicide Treatment Summary Report (Lakeland, 2015), and includes species observed, relative abundance (percent cover by species) and total cover by species.

Pre- and post- treatment surveys were completed and included visual observations and rake toss samples from a boat at each location. Rake tosses generally consist of 3-4 rake throws within the treatment area and 2-3 rake throws outside the treatment area. The number of rake throws varied based upon the size of the treatment area. In addition to the rake tosses, BioBase mapping was completed in and out of the treatment areas to measure the plant volume present before and after treatments. The treatment areas ranged in size from 0.44 acres to 10.98 acres. The species observed, relative abundance, and total cover by species were recorded. Data collected during pre-treatment surveys was compared with the data collected during the post-treatment surveys (Table 1). The total aquatic vegetation cover (all aquatic species included) for each location was estimated during the pre-treatment surveys and then compared to the total aquatic vegetation cover estimated at each location during the post-treatment surveys to evaluate the effectiveness (efficacy) of the treatments. The lake bottom and/or the aquatic vegetation was visible at all sampling locations therefore visual observations were utilized to estimate total cover. If the lake bottom or aquatic vegetation had not been visible, cover estimates would have been completed based upon the density of vegetation found on the rake throws. The efficacy is measured by the percent reduction in total aquatic vegetation cover. Overall, the total aquatic vegetation cover was reduced by 76% for the combined sites.

Lakeshore Estates was the only treatment site with a lower efficacy (24%). This may be due to treatment location relative to flows, the size and shape of the treatment area, species composition, sampling variations or other unknown factors.

Pre-and post-treatment surveys were completed together by both Avista and Lakeland. Table 2 identifies all of the species observed during the pre- and post-treatment surveys. Detailed data sheets identifying the species present at each location and the cover by species are maintained electronically by Avista for future comparisons or reference.

Table 1. Herbicide Treatment Effectiveness Table

LOCATION	ACREAGE TREATED	Aquatic Vegetation Cover		
		Pre-	Post-	Efficacy*
Nine Mile Resort	9.90	50%	10%	80%
Lake Spokane Park	0.56	90%	15%	83%
Lakeridge	1.11	100%	5%	95%
Suncrest	1.41	50%	15%	70%
West Shore	1.24	70%	15%	79%
Lake Forest Community	10.03	70%	15%	79%
Felton Slough	0.63	50%	10%	80%
Willow Bay Resort/Lakeview	1.83	75%	5%	93%
Lakeshore Estates	0.44	55%	42%	24%
Nine Mile Boating Lane	10.98	65%	15%	77%
Totals	38.13			76%

* Efficacy is determined by the difference between pre-treatment and post-treatment cover divided by the pre-treatment percent cover.

2.3 Flowering Rush Control in Lake Spokane and Nine Mile Reservoir

Lake Spokane

In 2010, Ecology completed a surface survey of Lake Spokane and identified, and mapped approximately 100 locations of flowering rush. Between 2011-2014, Avista implemented hand removal of flowering rush utilizing a diver suction device. Avista removed approximately 200, 900, 485, and 580 flowering rush plants between 2011 and 2014 respectively.

In 2015, Avista continued to implement flowering rush control and contracted with ACE Diving to locate and remove flowering rush during September and October. Treatments were carried out by SCUBA divers, aided by people wading and/or snorkeling in shallow sites as appropriate. Prior to initiating any flowering rush treatments, Avista completed reconnaissance level surveys with ACE Diving to locate the plants. The preferred option for controlling flowering rush was by hand pulling, utilizing a diver suction device taking special care to ensure the entire plant was removed. Approximately 1,583 flowering rush plants were removed (Figure 1).

Table 2. Species Observed during Pre- and Post-Treatment Surveys

Species Observed During Surveys	
Common Name	Scientific Name
Sago pondweed	<i>Potamogeton pectinatus</i>
Small pondweed	<i>Potamogeton pusillus</i>
Elodea	<i>Elodea canadensis</i>
Richardson's pondweed	<i>Potamogeton richardsonii</i>
Najas	<i>Najas spp.</i>
Muskwort	<i>Chara spp.</i>
Coontail	<i>Ceratophyllum demersum</i>
Curlyleaf pondweed	<i>Potamogeton crispus</i>
Flat-stem pondweed	<i>Potamogeton zosteriformis</i>
Fragrant waterlily	<i>Nymphaea odorata</i>
Filamentous algae	
Eurasian watermilfoil	<i>Myriophyllum spicatum</i>
Flowering rush	<i>Butomus umbellatus</i>

Nine Mile Reservoir

Flowering rush was identified in 2012 during informal surveys of Nine Mile Reservoir that were completed independently by both Avista and Ecology. In 2013, Avista and Ecology completed a visual survey of Nine Mile Reservoir for flowering rush and identified approximately 200 flowering rush plants. In 2014, Avista completed another visual survey and identified approximately 1,150 plants.

In 2014, Avista implemented diver hand removal (described above) and removed approximately 170 plants from Nine Mile Reservoir. In 2015, Avista continued diver hand removal efforts and removed approximately 160 plants (Figure 1). Flowering rush removal efforts in Nine Mile Reservoir were focused at the most densely populated locations.

2.4 Lake Spokane Aquatic Weed Control Drawdown Monitoring

In 2015, Lake Spokane was not drawn down due to unseasonably high inflows and warmer than normal weather during the winter.

Drawdown Vegetation Monitoring

Ten monitoring locations (identified on Figure 1) were established in high-use recreation areas, community boat launch areas, and in problematic aquatic weed areas for pre- and post-drawdown monitoring. Drawdown monitoring was completed in June-August of 2015 and consisted of rake throws and visual observations made at each of the ten monitoring locations. Data recorded on field monitoring sheets includes the specific dates, monitoring locations, species observed, relative abundance, total cover by species, estimated plant height and/or biomass (when possible) for an approximate 10 x 10 foot sampling plot. This information has been collected for multiple

years to assist in determining if the overall plant cover and biomass is reduced due to the winter drawdowns.

After 5 years of monitoring, no conclusive evidence has been determined that the drawdown is reducing overall aquatic vegetation cover and biomass in Lake Spokane. However in 2015, milfoil was detected at several of the locations during the drawdown monitoring where it was not previously observed. Additionally, milfoil was observed more frequently and with greater distribution in Lake Spokane then in the previous years. This could be due to the lack of drawdown over the winter or because temperatures were unseasonably warmer earlier than in previous years, resulting in a longer growing season. The results of the 2011-2015 drawdown monitoring are identified in Table 3.

Table 3. Winter Drawdown Monitoring - Total Cover of All Species Observed

Winter Drawdown Data	Total Cover of all species*				
	2011	2012	2013	2014	2015
Total days water level was lowered ten feet or more	0	57	23	50	0
Total days soil temperature was below zero*	0	0	0		0
Dates of drawdown	**	Jan 20-Mar 16	Feb21-Mar15	Jan 20-Mar 10	**
Monitoring Location					0
Lake Spokane Campground W	5%	0%	0%	0%	2%
Lake Spokane Campground E	16%	20%	45%	10%	15%
Lakeshore Estates	43%	70%	85%	65%	75%
Willow Bay Resort	66%	46%	75%	75%	75%
Lake Forest Community	85%	50%	45%	100%	100%
Sportsmans	100%	45%	105%	105%	105%
Suncrest	63%	64%	60%	30%	35%
Lake Ridge/Nine Mile Boat Lane	90%	97%	35%	35%	65%
Nine Mile Rec Area W	75%	75%	55%	40%	55%
Nine Mile Rec Area E	95%	95%	55%	55%	60%

*The species composition is a combination of species identified in Table 2.

**The winter drawdown did not occur.

Soil Temperature Monitoring

Soil temperature monitoring was not completed in 2015 due to high inflows in the winter and the lack of a Lake Spokane drawdown.

2.5 Education

The AWMP also requires Avista to implement education and outreach activities relevant to minimizing the spread of aquatic weeds as part of the comprehensive Interpretation and Education (I&E Plan). As described in the I&E Plan, Avista cooperates with the relevant agencies to develop brochures and other outreach materials that explain how to minimize the spread of invasive aquatic species.

In 2015, Avista distributed an aquatic weed brochure, specific to Lake Spokane that discusses the elements of Avista's AWMP, benefits of a healthy aquatic weed ecosystem, negative effects of invasive aquatic weeds, and ways to prevent the spread of invasive aquatic weeds.

2.6 Planned Activities for 2016

Avista plans to meet with the Cooperating Parties in March, 2016 to develop the List that will identify the year's weed control activities. Avista anticipates the following tasks will be included in the 2016 List:

- Annual meeting with Cooperating Parties,
- Evaluate the public and community boat launches in Lake Spokane (and potential areas of Nine Mile Reservoir) for invasive or problematic aquatic weeds, delineate herbicide treatment areas where necessary and conduct pre-treatment surveys,
- Implement up to 20 acres of herbicide treatments in Lake Spokane and Nine Mile Reservoir,
- Conduct pre/post-drawdown monitoring,
- Flowering rush monitoring, mapping and control work in Lake Spokane,
- Flowering rush monitoring, mapping or control in Nine Mile Reservoir,
- Current mapping and distribution of flowering rush in both Lake Spokane and Nine Mile Reservoir will be compared with previous years maps to determine the extent and density,
- Implement educational activities including the distribution of educational brochures provided by Avista and cooperating parties,
- Submit Annual Summary Report to Ecology, WDFW and WDNR, and
- Submit Annual Summary Report to FERC following agency review.

3.0 REFERENCES

AquaTechnex. 2007. Aquatic Plant Survey and Mapping Project for Lake Spokane. Prepared by AquaTechnex, Centralia, WA for Avista Corporation, Spokane, WA. Fall 2007.

AquaTechnex. 2012. Aquatic Plant Survey and Mapping Project for Lake Spokane. Prepared by AquaTechnex, Centralia, WA for Avista Corporation, Spokane, WA. Fall 2007.

Avista. 2010. Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program. Spokane River Hydroelectric Project FERC Project No. 2545-091.

Avista. 2011. Lake Spokane and Nine Mile Reservoir Monitoring Plan for the Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program. Spokane River Hydroelectric Project FERC Project No. 2545-091.

Avista. 2012. Lake Spokane and Nine Mile Reservoir Monitoring Plan for the Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program. Spokane River Hydroelectric Project FERC Project No. 2545-091.

Lakeland Restoration Service. 2015. Lake Spokane and Nine Mile Reservoir Herbicide Treatment Summary Report.

TetraTech. 2001. Lake Spokane Integrated Aquatic Plant Management Plan. Prepared by TetraTech, Inc., Seattle, WA. Prepared for Stevens County Conservation District and Washington State Department of Ecology. February 2001.

FIGURES

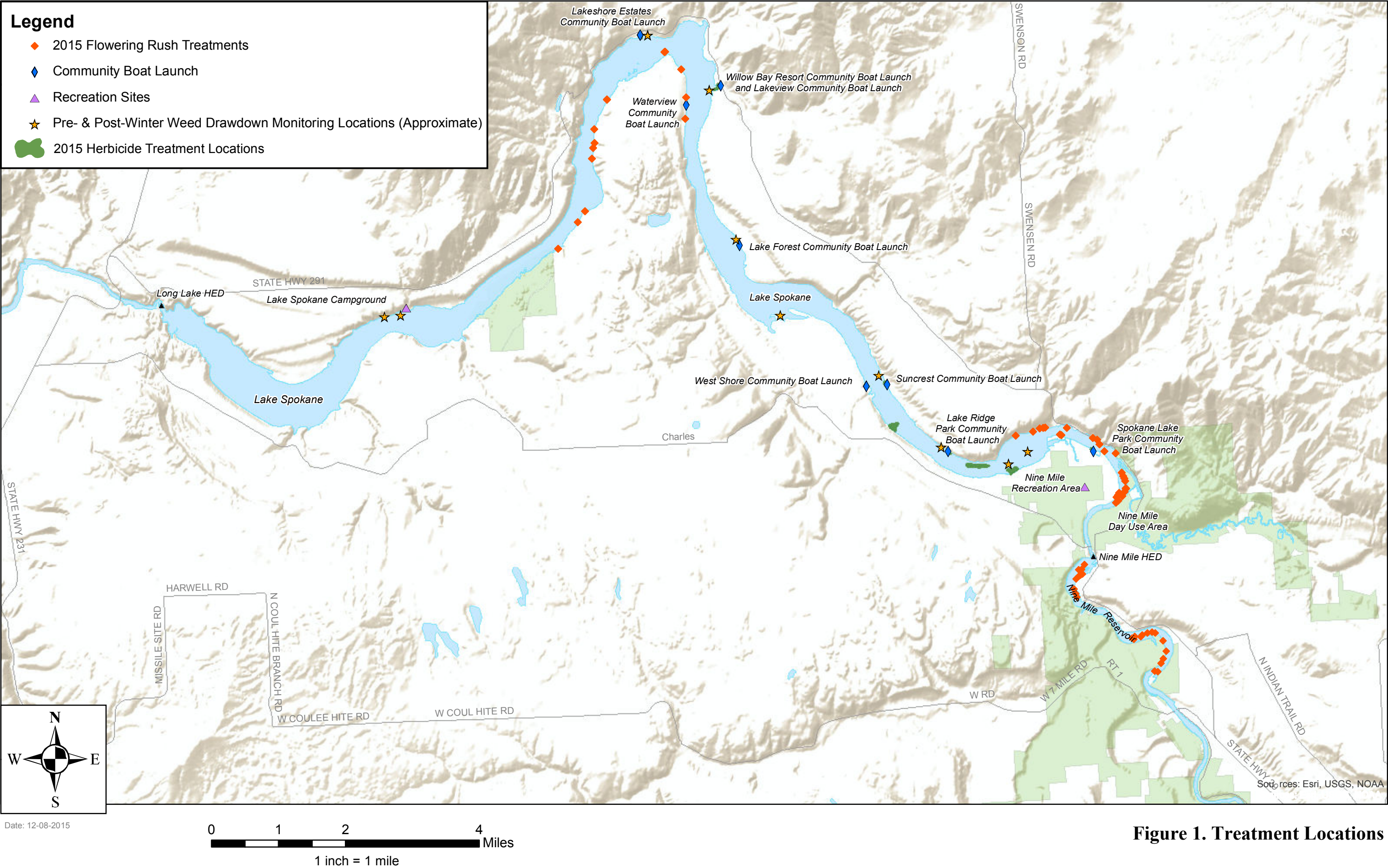
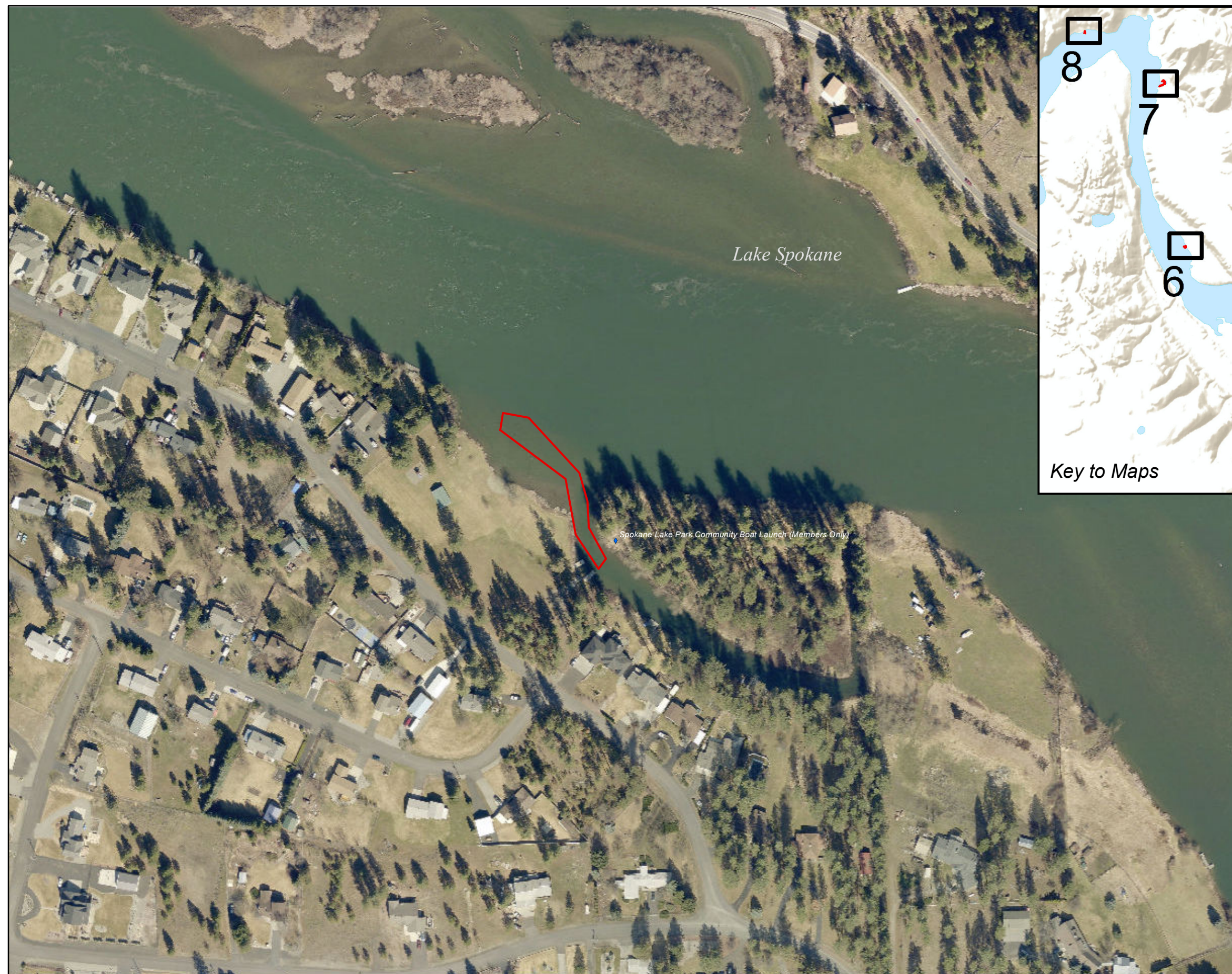
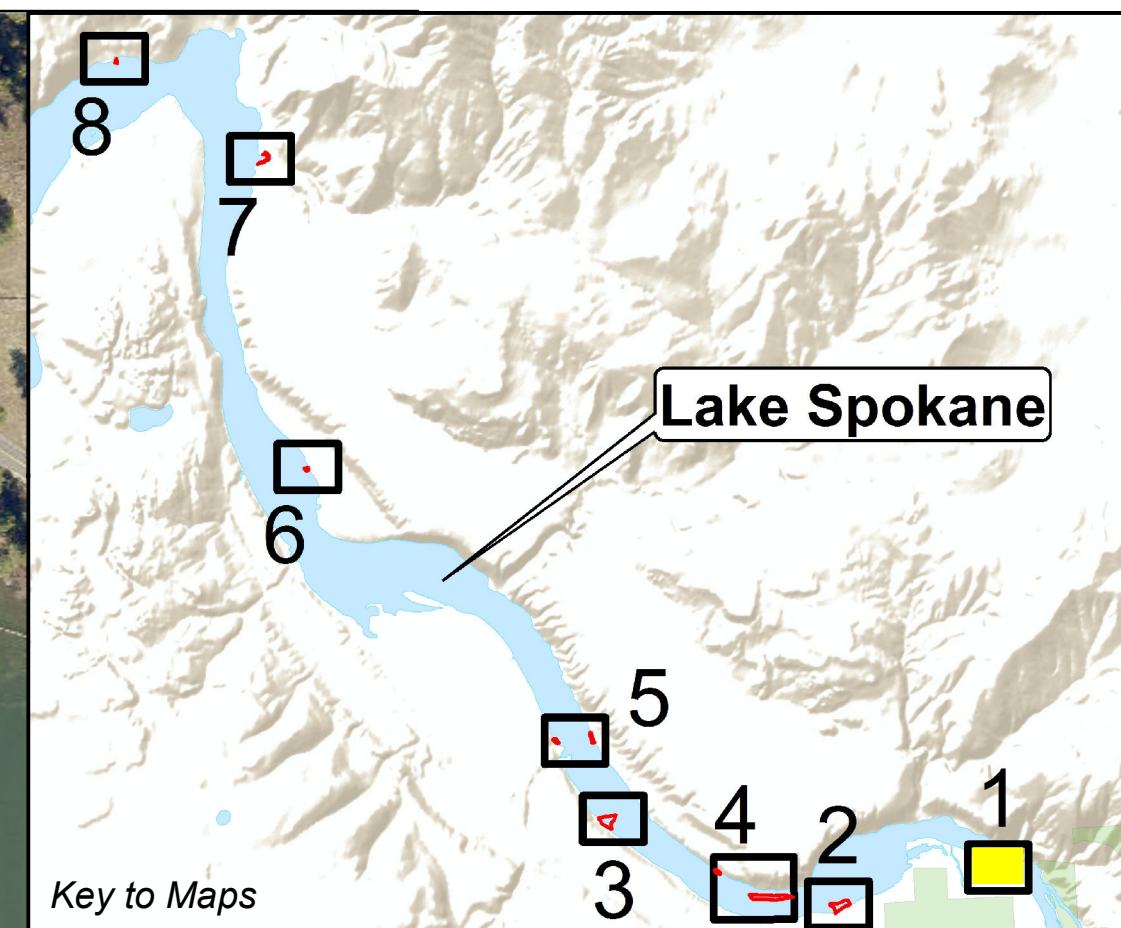


Figure 1. Treatment Locations

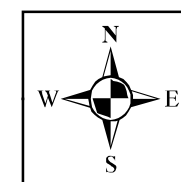


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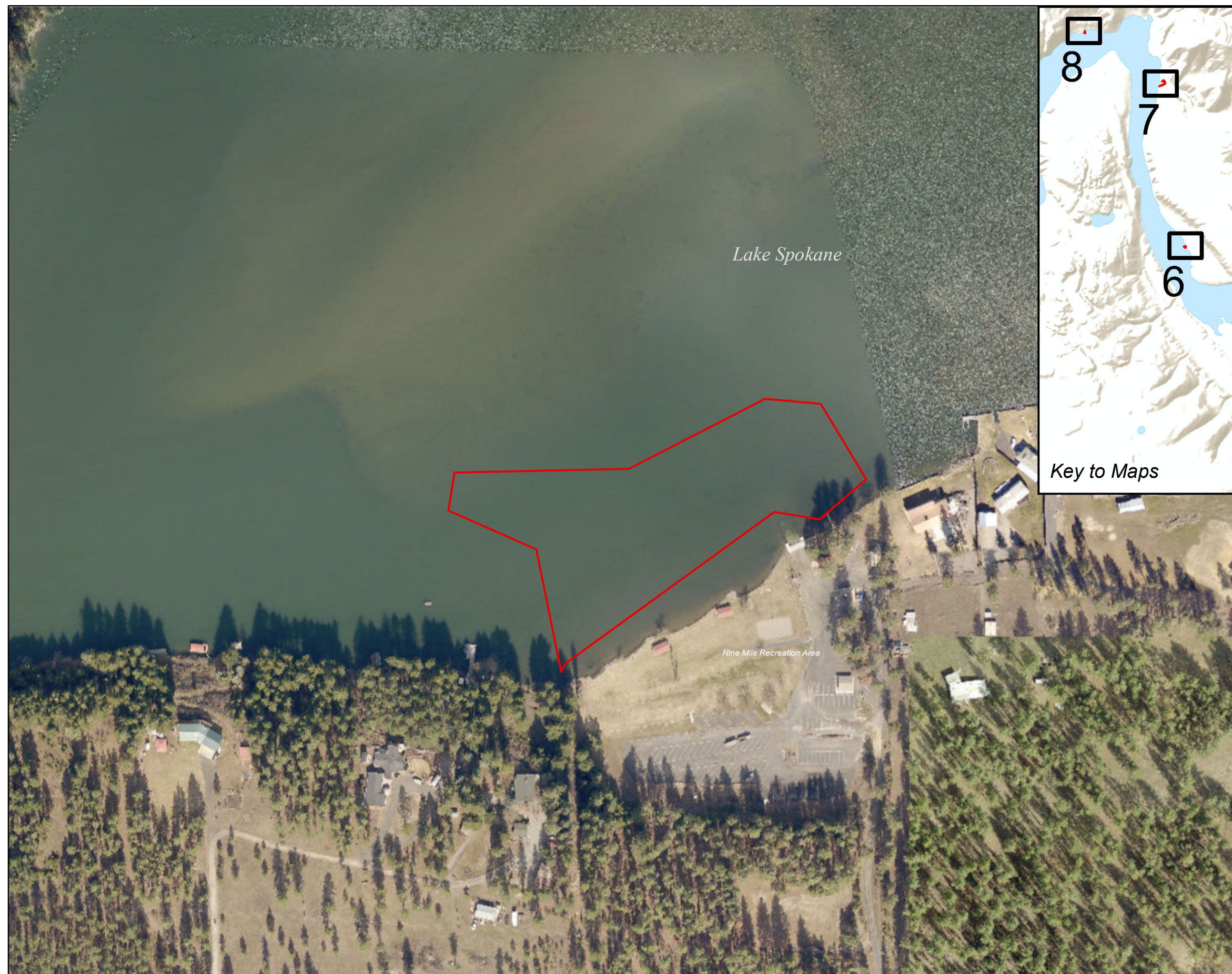
- 2015 Treatment Locations
- Community Boat Launch
- Recreation Sites



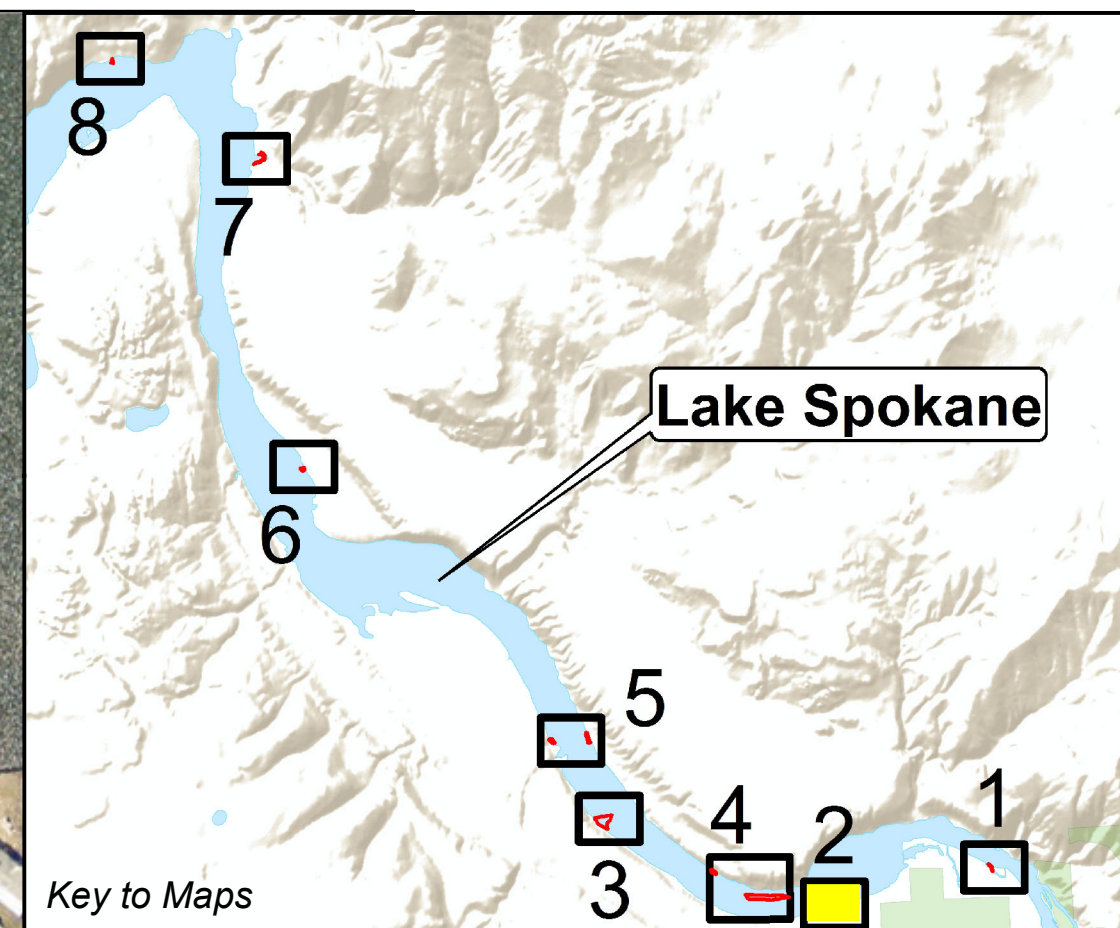
1 inch = 200 feet

Figure 2. Spokane Lake Park Treatment Area

Map 1 of 8

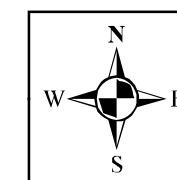


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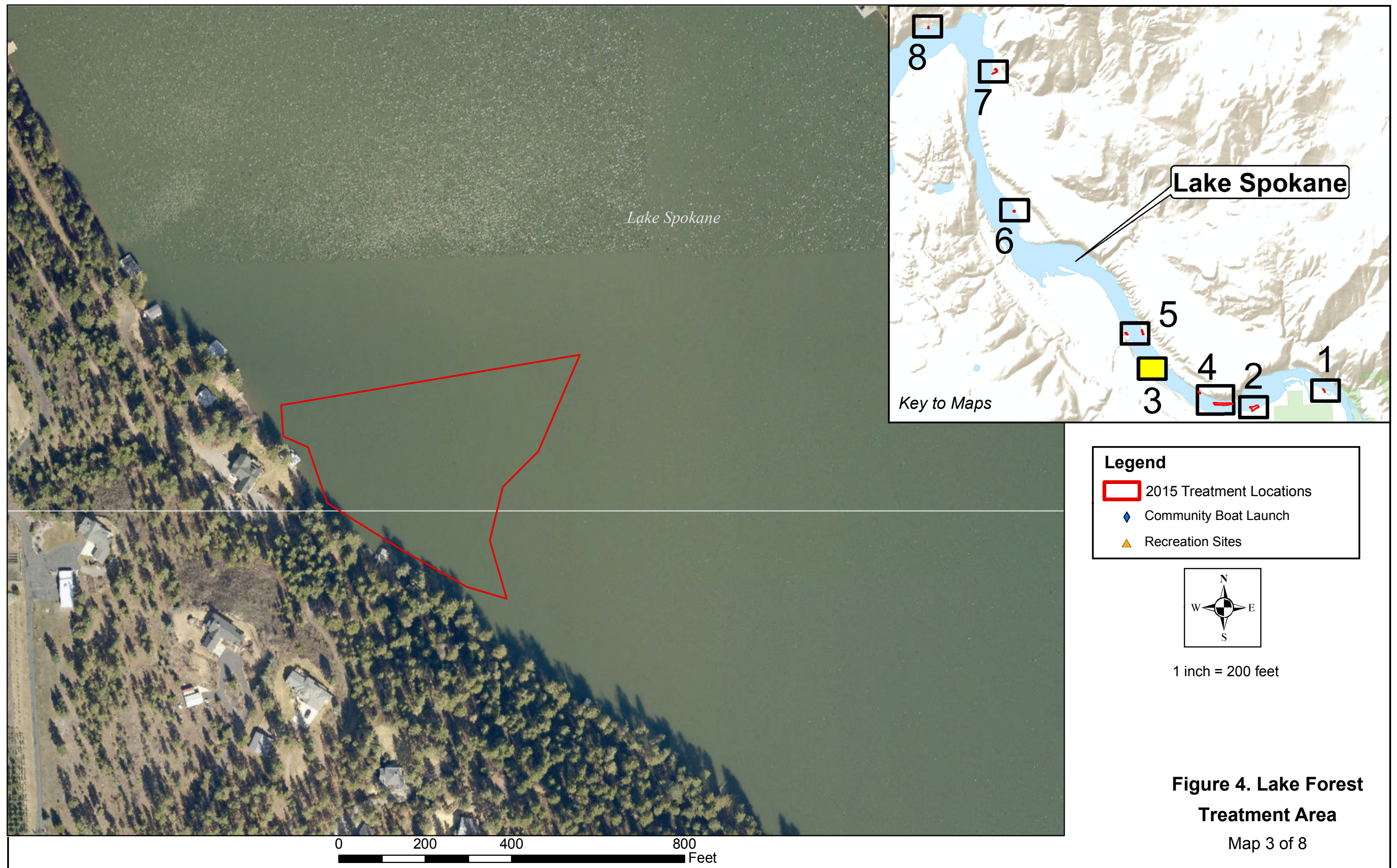
- 2015 Treatment Locations
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- Recreation Sites

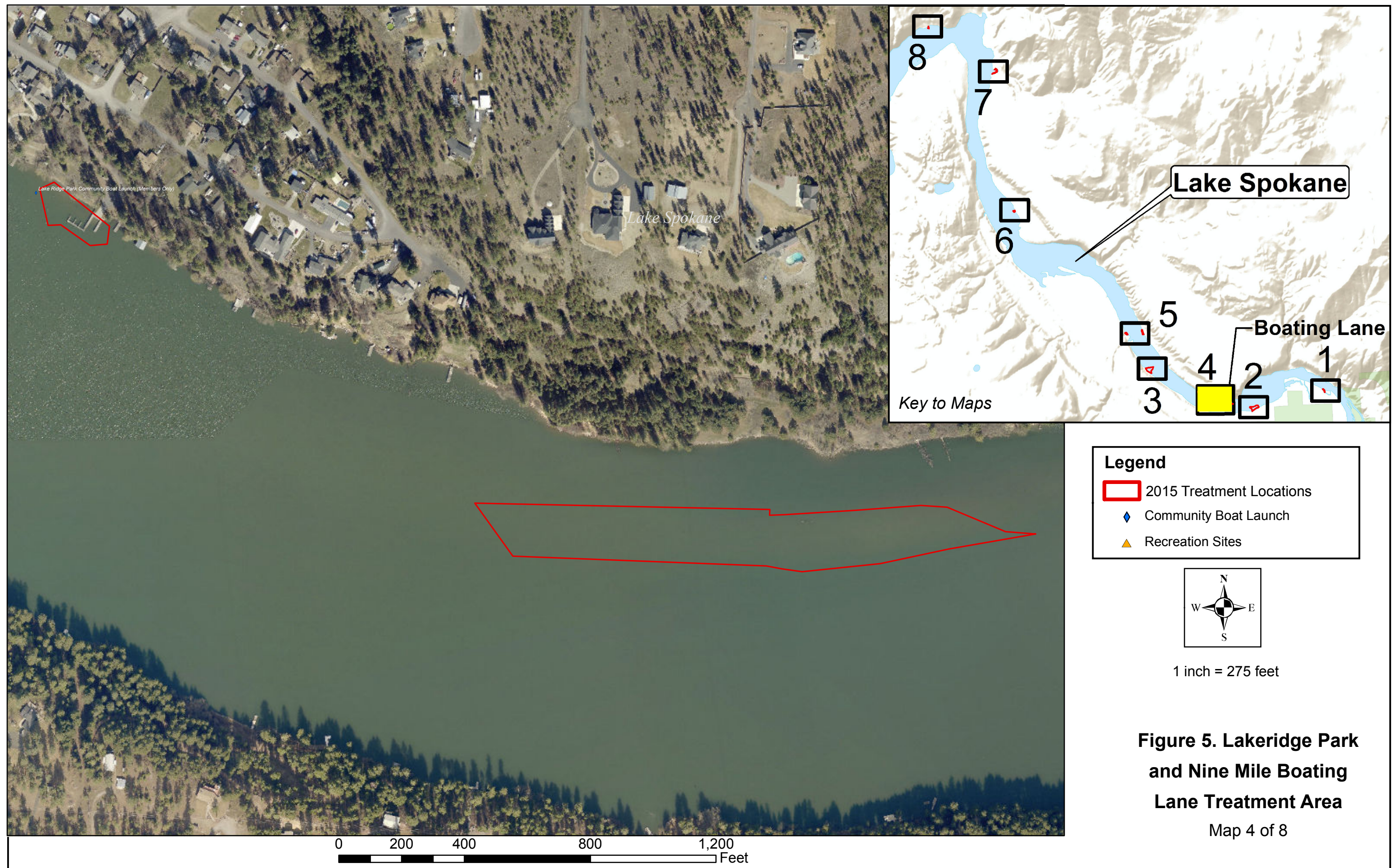


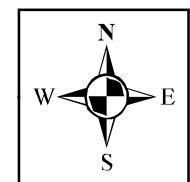
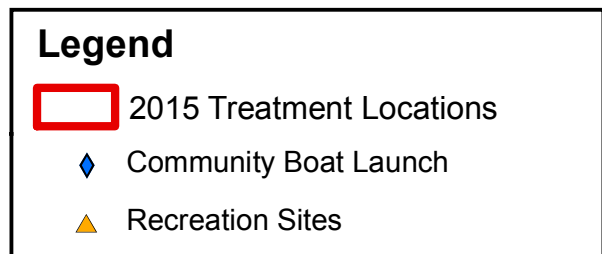
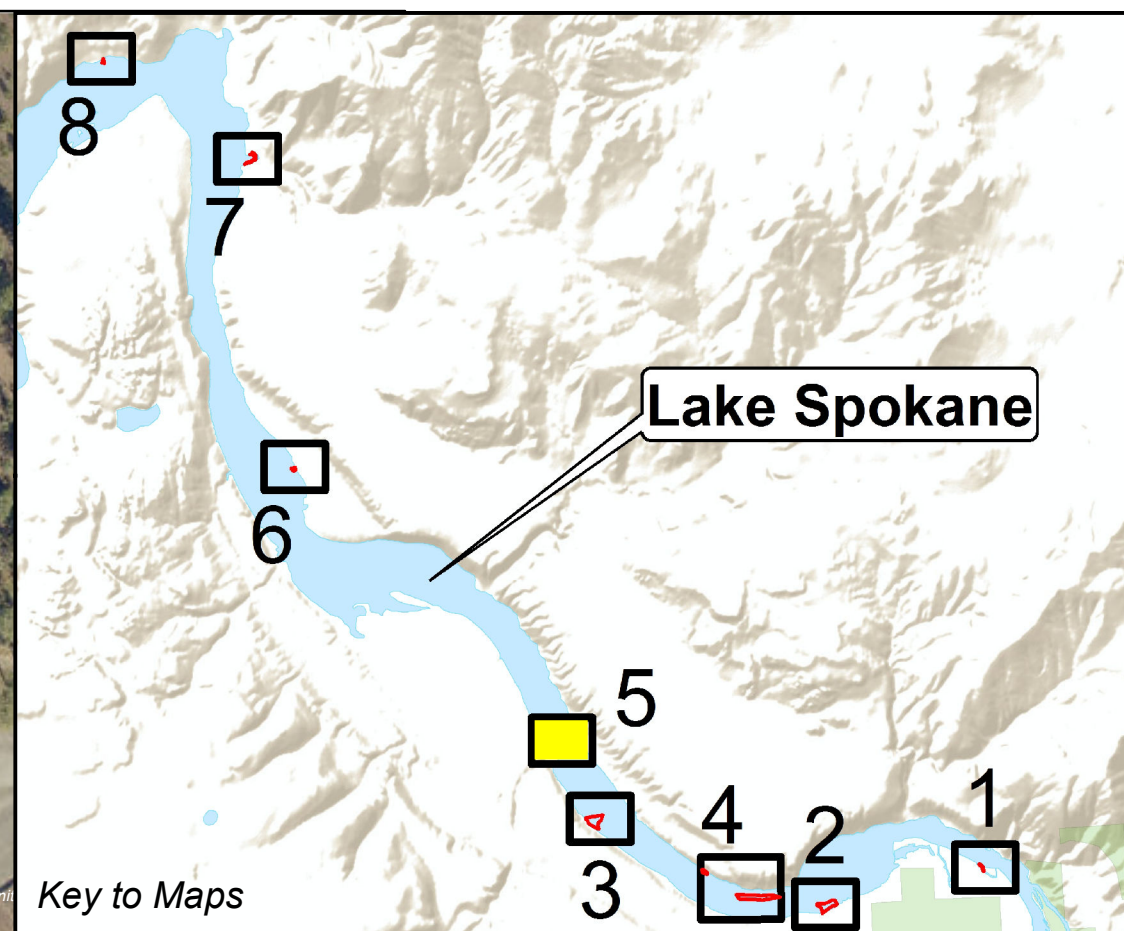
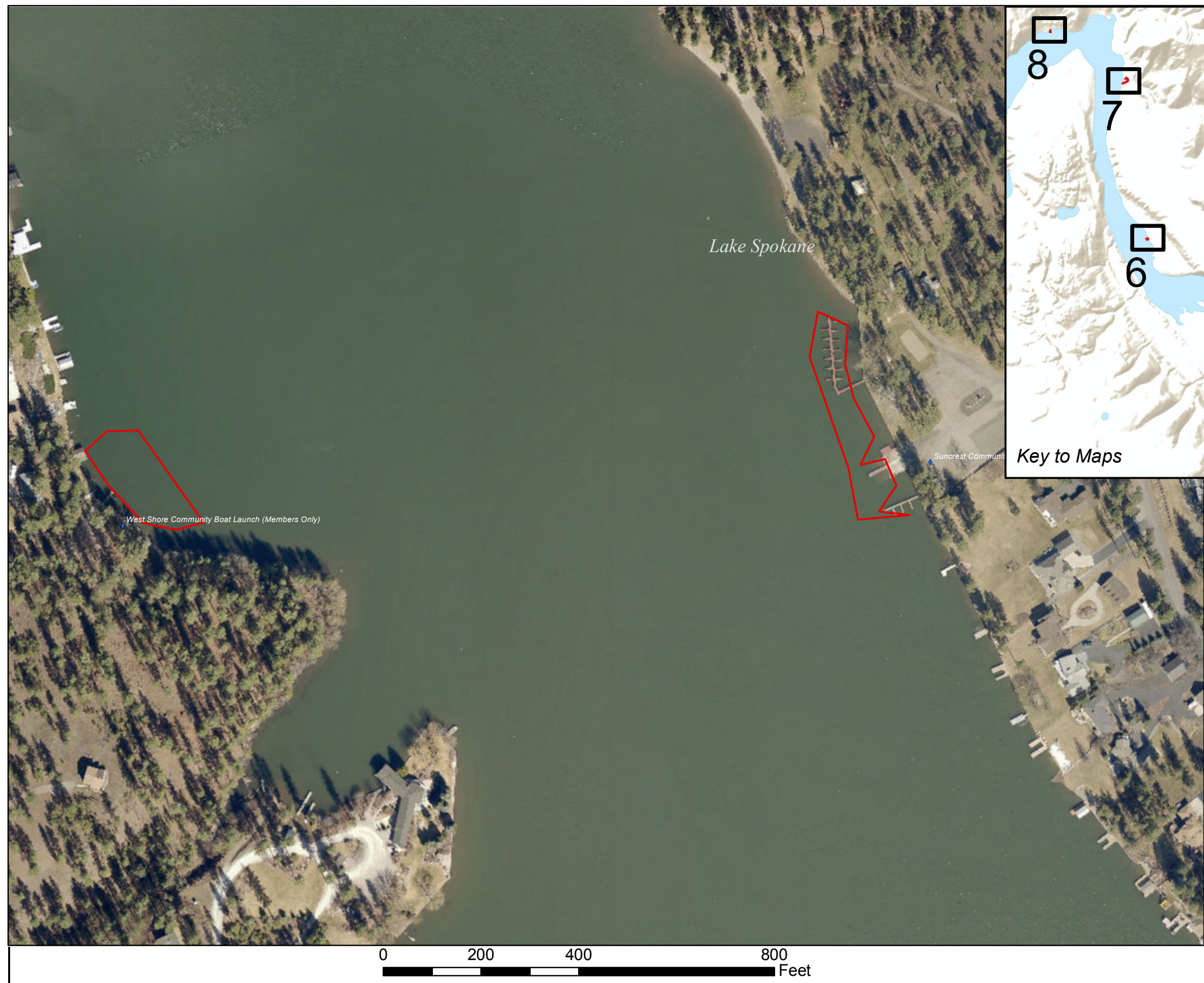
1 inch = 200 feet

Figure 3. Nine Mile Recreation Treatment Area

Map 2 of 8

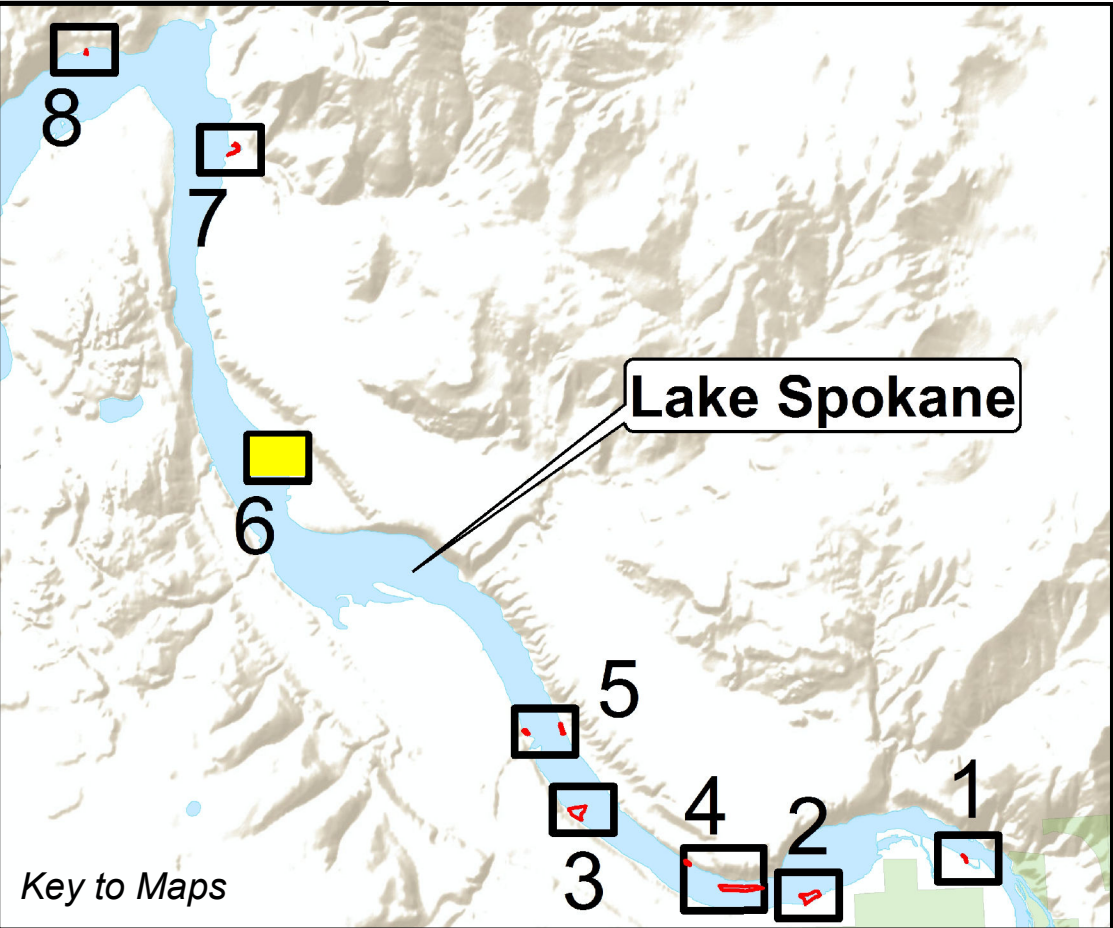






1 inch = 200 feet

**Figure 6. Suncrest
Treatment Area**
Map 5 of 8



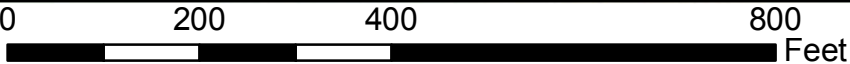
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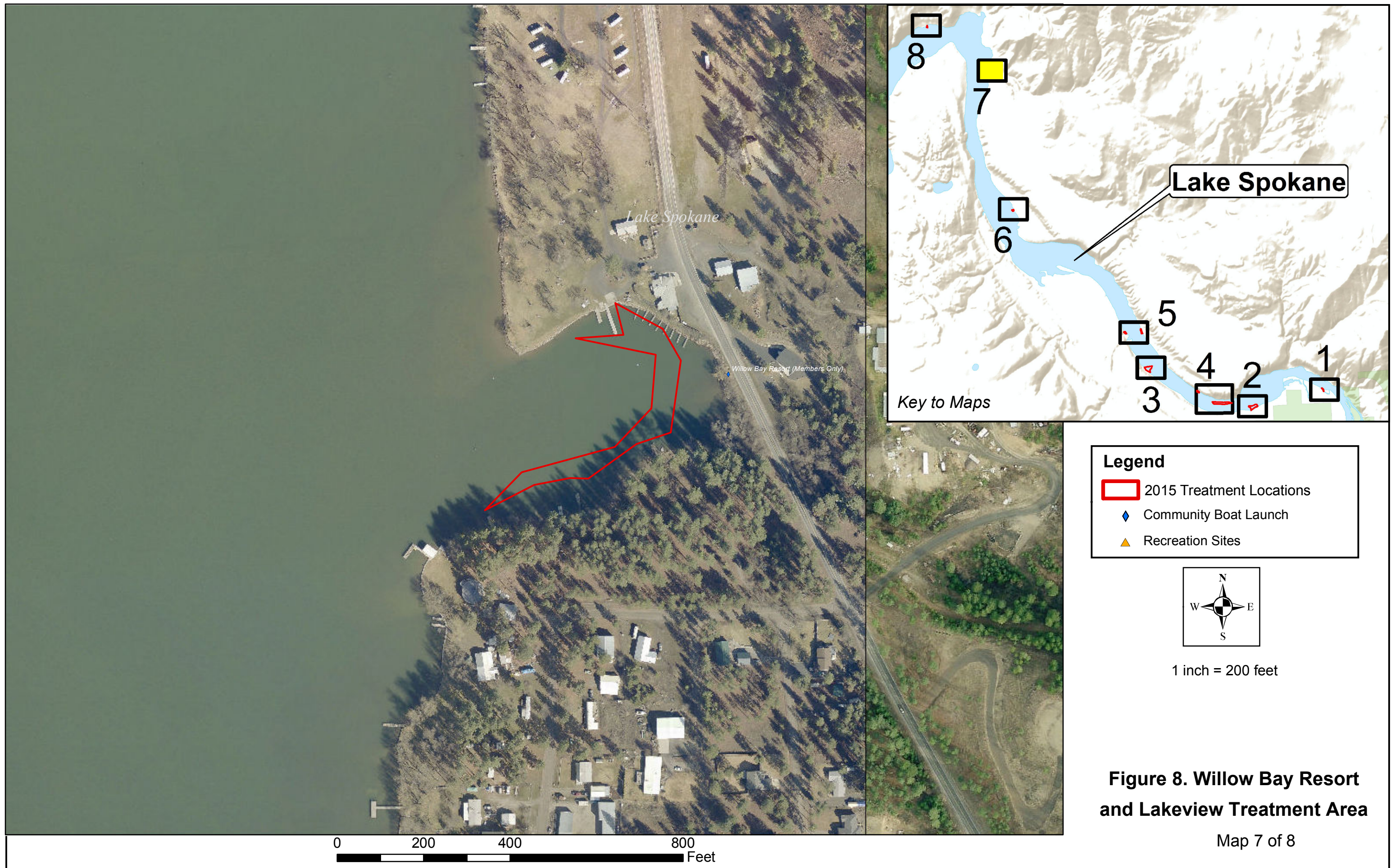
- 2015 Treatment Locations
- Community Boat Launch
- Recreation Sites

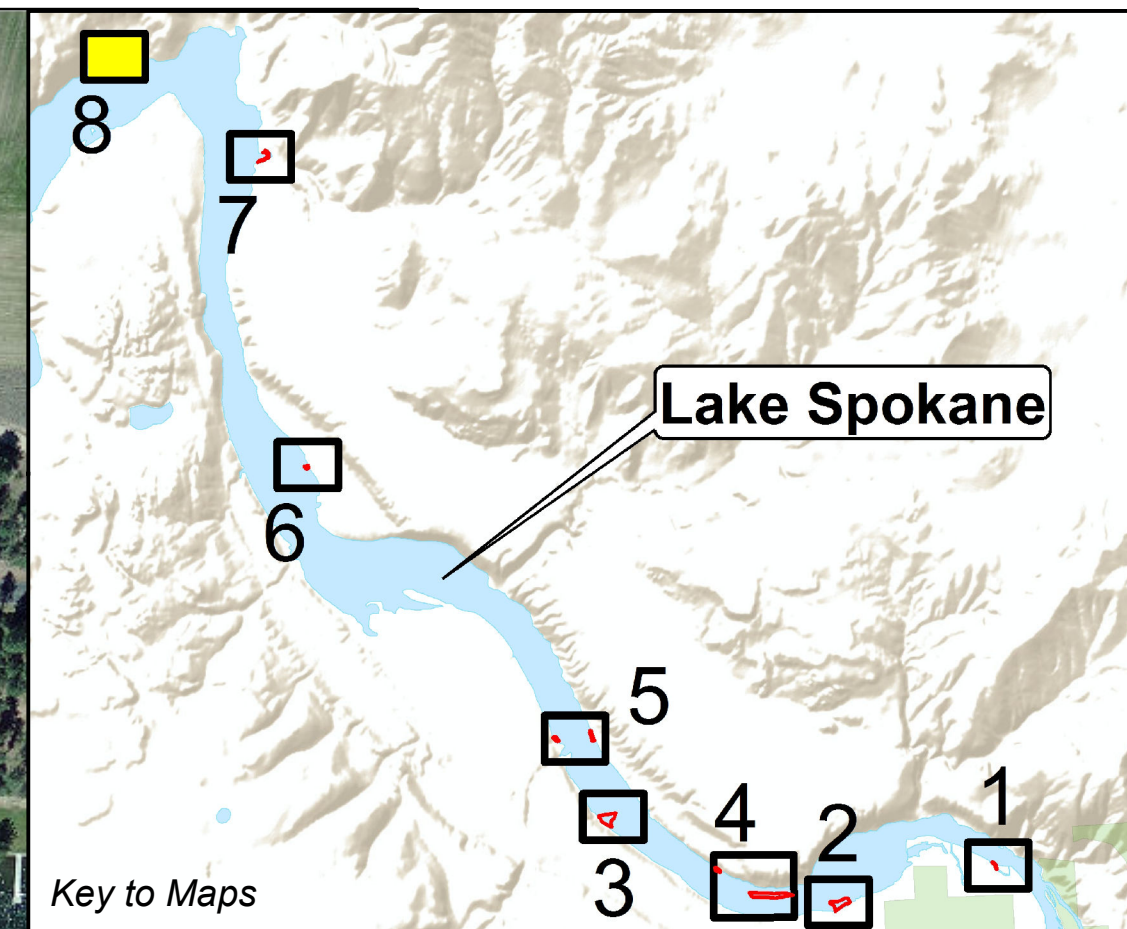


1 inch = 200 feet

Figure 7. Lake Forest Treatment Area



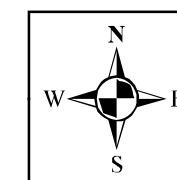




Key to Maps

Legend

- 2015 Treatment Locations
- Community Boat Launch
- Recreation Sites



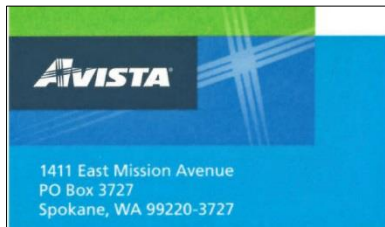
1 inch = 200 feet

Figure 9. Lakeshore Estates Treatment Area



APPENDIX A
CONSULTATION RECORD

Avista's Letter to the Washington Department of Ecology



December 30, 2015

Pat McGuire
Washington Department of Ecology
4601 N. Monroe Street
Spokane, WA 99205-1295

Subject: Spokane River Project License, FERC Project No. 2545, Appendix B Section 5.3(E), Submittal of the 2015 Lake Spokane and Nine Mile Aquatic Weed Management Program Summary Report

Dear Mr. McGuire:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License, Appendix B Section 5.3(E), Avista developed and submitted a Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Plan (Plan) for FERC's approval. FERC approved the Plan on January 13, 2011 allowing Avista to begin implementation.

The Plan requires Avista to submit an annual report that summarizes the activities that it implemented during 2015 to monitor and control aquatic weeds on Lake Spokane and Nine Mile Reservoir to the Washington Department of Ecology, the Washington Department of Fish and Wildlife, and the Washington Department of Natural Resources for a 30-day review prior to submitting it to FERC for approval.

With this, please review the attached 2015 Lake Spokane and Nine Mile Aquatic Weed Management Program Summary Report and provide any comments or recommendations that you may have to me prior to February 1, 2016.

If you have any questions regarding the annual report, please feel free to contact me at (509) 495-2796.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Armes", is written over a blue circular stamp.

David Armes
Terrestrial Resource Specialist

Enclosure

cc: Karin Divens, WDFW
Todd Brownlee, WDNR
Speed Fitzhugh, Avista

Washington Department of Ecology's Comments



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

January 14, 2016

Mr. David Armes
Terrestrial Resource Specialist
Avista Corporation
1411 East Mission Avenue, MSC-1
Spokane, WA 99220-3727

RE: Request for Ecology Review and Comments – *2015 Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program Summary Report*
Spokane River Hydroelectric Project, No. P-2545

Dear Mr. Armes:

The Department of Ecology (Ecology) staff has reviewed the *2015 Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Program Summary Report*. Avista sent the document to Ecology on December 30, 2015. The report is a requirement in Section 5.3.E of the 401 Water Quality Certification.

We have the following comments or suggestions for 2016:

- It would be beneficial to find out if the flowering rush is starting to break dormancy before the water level is brought back up after this winter's drawdown. If it isn't, then explore the possibility of holding the water level down a few extra weeks in the spring to allow herbicide treatment in future years.
- In Lake Pend Oreille, Idaho they have had a good year-of-treatment results using Imazapyr (and Izamamox) on flowering rush while the water level is down and just as the plants are breaking dormancy, which is at the end of April there. If this method shows that flowering rush has been reduced one year post-treatment, it might be worth trying on the flowering rush in Lake Spokane and Nine Mile reservoirs in coming years.

If you have any questions about our comments please contact me at (509) 329-3567 or pmcg461@ecy.wa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Patrick McGuire".

Patrick McGuire
Eastern Region FERC License Coordinator
Water Quality Program

PDM:jab

cc: Elvin "Speed" Fitzhugh, Avista



ECOLOGY COMMENTS AND AVISTA RESPONSES

Ecology Comment

It would be beneficial to find out if the flowering rush is starting to break dormancy before the water level is brought back up after this winter's drawdown. If it isn't, then explore the possibility of holding the water level down a few extra weeks in the spring to allow herbicide treatment in future years.

Avista Response

Avista will monitor selected flowering rush areas this year before the water level returns to its full pool elevation. Based on our observations, we will discuss drawdown treatments with the Cooperating Parties and with our operations staff to determine if they are feasible in the future. It is important to note that the extent and duration of the drawdowns are related to winter generation needs, temperatures, the amount of snow pack, rain on snow events, etc. within the watershed that are generally out of Avista's control.

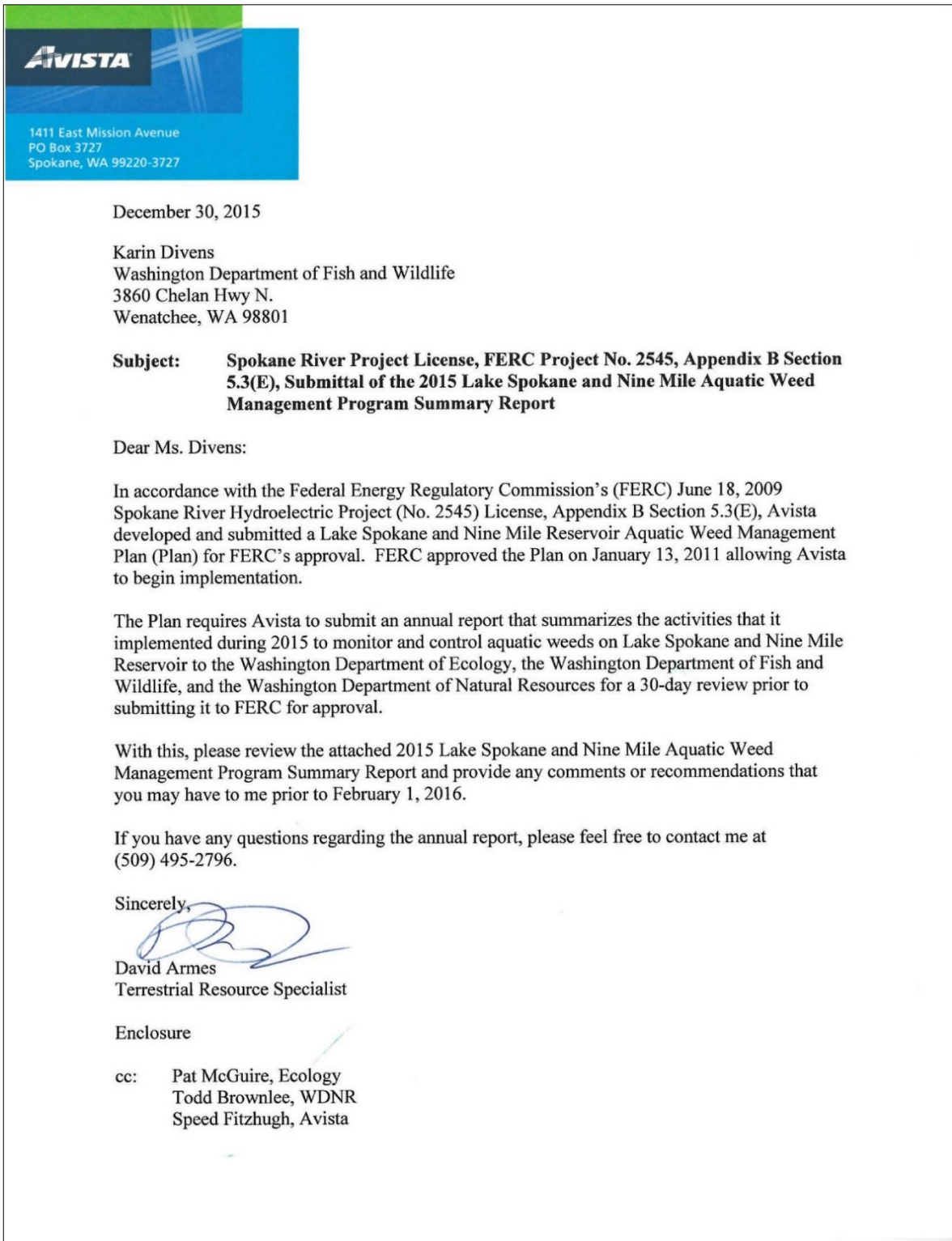
Ecology Comment

In Lake Pend Oreille, Idaho they have had a good year of treatment results using Imazapyr (and Izamamox) on flowering rush while the water level is down and just as the plants are breaking dormancy, which is at the end of April there. If this method shows that flowering rush has been reduced one year post-treatment, it might be worth trying on the flowering rush in Lake Spokane and Nine Mile reservoirs in coming years.

Avista Response

Avista is not involved in the Lake Pend Oreille flowering rush treatments; however, we will communicate with Ecology to learn if the one-year post treatment results are successful. If the results are successful, Avista will work with the Cooperating Parties and operations staff to determine if drawdown treatments are feasible for Lake Spokane in the future.

Avista's Letter to the Washington Department of Fish and Wildlife



Washington Department of Fish and Wildlife did not provide comments on the Summary Report.

Avista's Letter to the Washington Department of Natural Resources



December 30, 2015

Todd Brownlee
Washington Department of Natural Resources
PO Box 47000
1111 Washington Street SE
Olympia, WA 98504-7000

Subject: Spokane River Project License, FERC Project No. 2545, Appendix B Section 5.3(E), Submittal of the 2015 Lake Spokane and Nine Mile Aquatic Weed Management Program Summary Report

Dear Mr. Brownlee:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License, Appendix B Section 5.3(E), Avista developed and submitted a Lake Spokane and Nine Mile Reservoir Aquatic Weed Management Plan (Plan) for FERC's approval. FERC approved the Plan on January 13, 2011 allowing Avista to begin implementation.

The Plan requires Avista to submit an annual report that summarizes the activities that it implemented during 2015 to monitor and control aquatic weeds on Lake Spokane and Nine Mile Reservoir to the Washington Department of Ecology, the Washington Department of Fish and Wildlife, and the Washington Department of Natural Resources for a 30-day review prior to submitting it to FERC for approval.

With this, please review the attached 2015 Lake Spokane and Nine Mile Aquatic Weed Management Program Summary Report and provide any comments or recommendations that you may have to me prior to February 1, 2016.

If you have any questions regarding the annual report, please feel free to contact me at (509) 495-2796.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Armes", is written over a horizontal line.

David Armes
Terrestrial Resource Specialist

Enclosure

cc: Pat McGuire, Ecology
Karin Divens, WDFW
Speed Fitzhugh, Avista

Washington Department of Natural Resources did not provide comments on the Summary Report.