AVISTA CORPORATION

COEUR D'ALENE LAKE AQUATIC WEED MANAGEMENT PLAN FOR NON-TRIBAL WATERS 2017 SUMMARY REPORT

SPOKANE RIVER LICENSE ARTICLE 410

SPOKANE RIVER HYDROELECTRIC PROJECT FERC PROJECT No. 2545

Prepared By: Avista Corporation

February 27, 2018

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Appendix A. Consultation Record

1.0 INTRODUCTION

The purpose of the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) is to control and reduce the distribution of aquatic noxious weeds within Coeur d'Alene Lake. To achieve this, Avista cooperates with and supports a multitude of agencies that have existing aquatic weed management programs on Coeur d'Alene Lake. This report summarizes the measures completed by Avista, in cooperation with the Idaho Department of Environmental Quality (IDEQ), Kootenai County Noxious Weed Control Board (KCNWCB), Idaho State Department of Agriculture (ISDA), and the Coeur d'Alene Tribe (Tribe), together known as the Cooperating Parties.

1.1 Background

On June 18, 2009, the Federal Energy Regulatory Commission (FERC) issued a License for Avista's Spokane River Hydroelectric Project (Project) for a 50-year term. The License became effective on June 1, 2009 and includes operation of five Hydroelectric Developments (HEDs) on the Spokane River; one in Idaho (Post Falls HED) and four in the state of Washington (Upper Falls, Monroe Street, Nine Mile, and Long Lake HEDs). Article 410 of the License required the development of the Plan, which FERC approved on January 19, 2011 (FERC Order 2545-129). The Plan is specific to Avista's Post Falls HED, which is located on the Spokane River approximately nine miles downstream from the outlet of Coeur d'Alene Lake.

1.2 Coeur d'Alene Lake Aquatic Weed Management Plan

Article 410 of the License required Avista to develop the Plan in consultation with the Idaho Department of Fish and Game, and the United States Fish and Wildlife Service. The Plan provides for the management of aquatic noxious weeds within the Post Falls HED Project boundary, excluding the Coeur d'Alene Indian Reservation (Reservation) (Figure 1), and includes the following elements:

- Provisions to establish or expand aquatic noxious weed educational programs;
- A framework for annual monitoring to determine the distribution of aquatic noxious weeds; and
- Management strategies for the control of aquatic noxious weeds.

The Plan also identifies the Cooperating Parties that are currently involved in managing aquatic noxious weeds within the Project boundary and a schedule, within which Avista implements the various measures. Avista cooperates with and supports the Cooperating Parties in implementing relevant aquatic weed management programs.

The littoral habitat within the Project boundary has been surveyed annually for aquatic noxious weeds since 2006, with most areas susceptible to weed infestation having been surveyed more than once. During the surveys three types of milfoil were identified. These included native northern watermilfoil (*Myriophyllum sibiricum*), non-native Eurasian watermilfoil (*M. spicatum*) and a hybrid of the two. Non-native Eurasian watermilfoil and the hybrid Eurasian watermilfoil, hereafter collectively referred to as milfoil, are the only two aquatic noxious weeds that have been identified in the area and that are addressed by the Plan.

Infestations of milfoil were identified in Harrison Slough, Heyburn State Park, and within the chain lakes along the Coeur d'Alene River (Cave, Medicine, Blue, Thompson, Anderson, Killarney and Black Lakes) (CDAT 2006, 2007, 2008, 2009, 2010; Avista 2011, 2013). In addition, Avista and the Tribe (2008-2017) have identified infestations of milfoil within the Reservation boundary, and the St. Joe and St. Maries rivers upstream of the Reservation boundary, which are managed under the Coeur d'Alene Reservation Aquatic Weed Management Plan.

2.0 COORDINATION

Avista met with the Cooperating Parties on April 20, 2017 to develop the following 2017 task list:

- Coordinate aquatic weed monitoring, education and outreach, and treatment efforts;
- Partner with IDEQ to survey and monitor for milfoil;
- Complete milfoil hand pulling, using a diver suction dredge in Mica Bay or other locations as needed;
- Complete herbicide treatment of milfoil as needed;
- Coordinate milfoil management with the Tribe within Tribal waters; and
- Partner with Kootenai County to provide educational funding for 2017 activities.

3.0 SURVEYS

In 2011, Avista and IDEQ mapped suitable milfoil habitat and identified a survey rotation based on susceptibility to milfoil infestation within Coeur d'Alene Lake (Avista 2011). This survey rotation is implemented annually per the following schedule: high priority suitable habitats are surveyed a minimum of once per three-year period; moderate priority suitable habitats are surveyed a minimum of once per four-year period; and low priority suitable habitats and shoreline segments are surveyed a minimum of once per five-year period (Figure 2).

Surveys completed from 2011-2017, identified varying amounts of milfoil in bays located within the non-tribal waters of Coeur d'Alene Lake including Mica, Windy, Sixteen to One, Beauty, and Wolf Lodge bays, and Harrison Slough. Additionally, an estimated of 600-700 acres of milfoil has been identified in the chain lakes, including Anderson, Black, Blue, Cave, Killarney, Medicine and Thompson lakes. These acreage totals are estimates, with varying levels of density, and vary, based on seasonal conditions and management activities (discussed in Section 4.0). A map of the 2011-2017 survey results in non-tribal waters, was combined with known locations of milfoil in Tribal waters (managed under the Coeur d'Alene Reservation Aquatic Weed Management Plan) to provide a general overview of the surveyed populations of milfoil in Coeur d'Alene Lake (Figures 3 and 4).

Avista continued to implement the original 2011 survey rotation during 2017. This included visual and point intercept surveys at Mica, Windy, Echo, Turner and Beauty bays, Harrison Slough, and Blue, Black and Thompson lakes on July 20 and 21. Additionally, IDEQ completed visual surveys in Blue Creek, Bennett, Neachen, Beauty, Kidd Island and Wolf Lodge bays;

KCNWCB also completed point intercept surveys in Wolf Lodge, Beauty, Sixteen to One, Windy and Mica bays; and ISDA completed point intercept surveys at NIC Beach, Third Street Boat Launch, Swede Point, Sanders Beach, Harrison Slough, as well as Cougar, Bennett, Blue Creek, Wolf Lodge, Beauty, Neachen, Echo, Gothom, Turner, Carlin, Loffs, Mica, Everwell and Kidd Island bays.

During the 2017 survey, Avista observed nine milfoil plants in Mica Bay, 25-30 plants in Windy Bay, and 30-35 acres of moderate to dense milfoil in Harrison Slough. The KCNWCB observed dense milfoil in Harrison Slough and ISDA observed milfoil in Cougar Bay, Wolf Lodge Bay and Harrison Slough.

4.0 MANAGEMENT / TREATMENTS

Avista discussed management options with the Cooperating Parties and agreed that herbicide applications would not be completed in 2017, but should instead focus on hand pulling milfoil in specific areas, monitoring existing populations, and surveying for new populations of milfoil.

Divers used a suction dredge while hand pulling milfoil in Mica, Windy, and Wolf Lodge Bays to remove the small amount of plants found there in 2017. Some milfoil plants may have not been visible due to the presence of dense native vegetation, resulting in milfoil being present but not observed or removed.

Avista monitored Thompson Lake, which had an herbicide treatment on 37 acres of milfoil in 2014 and Black Lake, which had an herbicide treatment on 15.6 acres in 2012. An estimated 40 plus acres of milfoil was observed in Thompson Lake, Black Lake contained approximately 20 acres within the northern non-tribal portion of the lake, and contained 43 plus acres on the southern portion of the lake within the Reservation boundary. Avista subsequently partnered with the Tribe to complete additional herbicide treatments on 42.5 acres of milfoil in Black Lake in 2017, as discussed in Section 5.0. Avista and the Cooperating Parties will continue to monitor and evaluate these lakes, as well as the other chain lakes for future treatments.

As indicated in Section 3.0, during 2017, Avista only observed nine Milfoil plants in Mica Bay, where 32 acres were treated in 2016, and observed 25-30 plants in Windy Bay, where 44 acres were treated in 2015. The 2016 Mica Bay treatment was very successful, reducing 32 acres of dense milfoil to one one-half acre of sparse milfoil one year after treatment. The 2015 Windy Bay treatment produced similar results reducing 44 acres of moderately dense milfoil to 1-2 acres of sparse milfoil two years after treatment.

Between 30 and 35 acres of milfoil were located while surveying for new plants in Harrison Slough, whereas scattered populations of varying densities were found in Blue Lake. These lakes will continue to be monitored and evaluated for future herbicide treatments.

5.0 MILFOIL MANAGEMENT IN COEUR D'ALENE LAKE TRIBAL WATERS

In addition to working with the Cooperating Parties to monitor and control aquatic weeds on Coeur d'Alene Lake in non-tribal waters, Avista also funded aquatic weed control efforts in Tribal waters in 2017. The areas that were treated, the methods used to control aquatic weeds and the efficacy scales are per the Coeur d'Alene Reservation Aquatic Weed Management Plan and are listed below.

Bottom Barriers

The Tribe placed bottom barriers on approximately 4,000 square feet of milfoil and problematic aquatic weeds in Cottonwood Bay (Camp Larson swim area). The 10 foot x10 foot barrier panels were placed over dense patches of aquatic weeds and were left in place for an eight-week period. The efficacy for the bottom barrier treatment was excellent.

Herbicide Treatments

Avista and the Tribe hired "Clean Lakes" to complete herbicide treatments on approximately 42.5 acres of milfoil in the south end of Black Lake using Aquathol K (Endothol), which was applied using a sub-surface distribution method. The efficacy for the herbicide treatment was rated fair to excellent.

6.0 2017 EDUCATION / OUTREACH

Avista partnered with the KCNWCB by providing \$2,000 for weed identification handbooks, brochures and educational outreach materials with the theme "stop the spread of noxious weeds" to distribute at the 2017 North Idaho Fair.

Avista also met with Idaho State Senators Mary Souza and Steve Vick on May 5, 2017 and with the Kootenai County Commissioners on August 7, 2017 to discuss the Plan and future improvements to public notifications regarding herbicide treatments. Avista met with the Senators to address a citizen concern regarding the 2016 Mica Bay herbicide treatment. Avista has since worked with the Cooperating Parties to simplify the public notifications that are placed on homeowner and public docks, and to develop a better method of informing people about local weed treatments.

7.0 FUNDING

Avista made the following funding available for aquatic weed management under this Plan:

Table 1. 2017 Aquatic Weed Funding

ACE Diving Hand Pulling Milfoil	\$1,500.00
Kootenai County Noxious Weed Control Board	\$2,000.00
TOTAL	\$3,500.00

8.0 PLANNED ACTIVITES FOR 2018

As outlined in the Plan, Avista annually identifies areas for upcoming surveys, reviews available funding, and schedules an annual meeting with the Cooperating Parties to develop and coordinate the aquatic weed management activities. A final task list is completed prior to May 1, on an annual basis. Avista is currently in the process of preparing for and scheduling the annual meeting for 2018. Avista will continue public outreach, educational and notification activities in 2018.

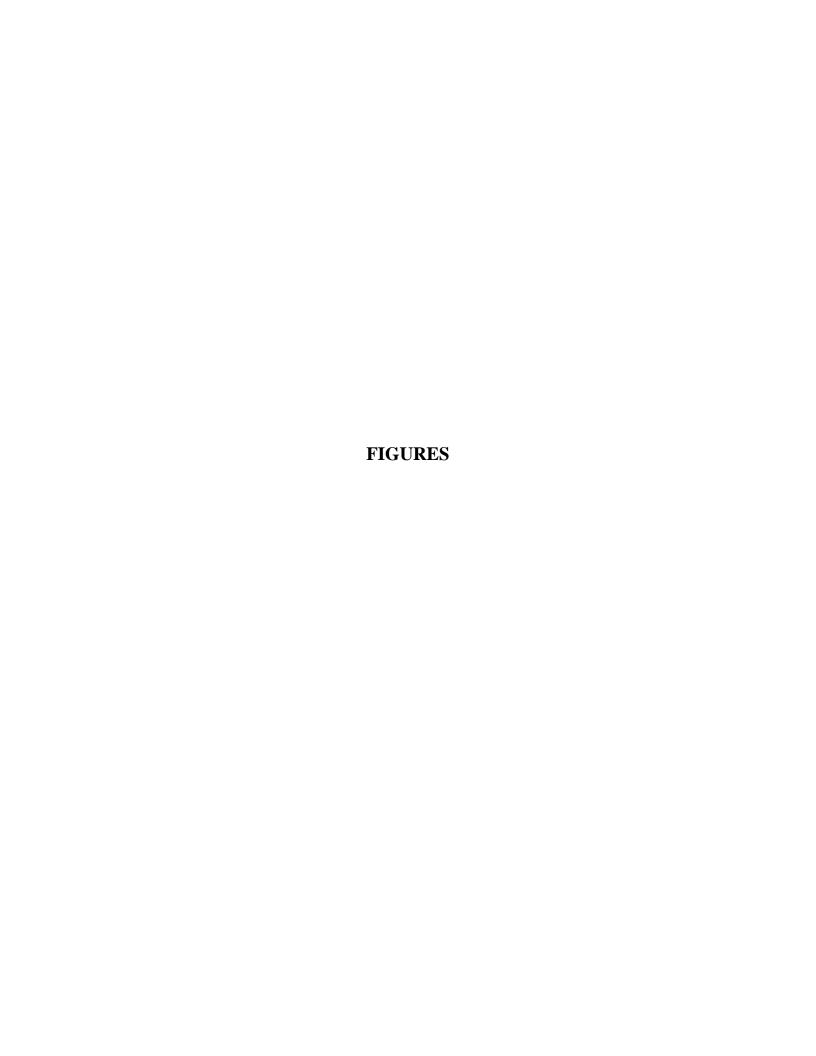
Management options for milfoil populations in Harrison Slough and Cougar Bay will be discussed with the Cooperating Parties as a priority in 2018. Due to the amount of milfoil in Harrison Sough, the preferred management option is likely an herbicide treatment. Only a few patches of milfoil were identified in Cougar Bay, therefore the preferred management option is likely diver hand pulling. These will be discussed and determined by the Cooperating Parties during the annual meeting.

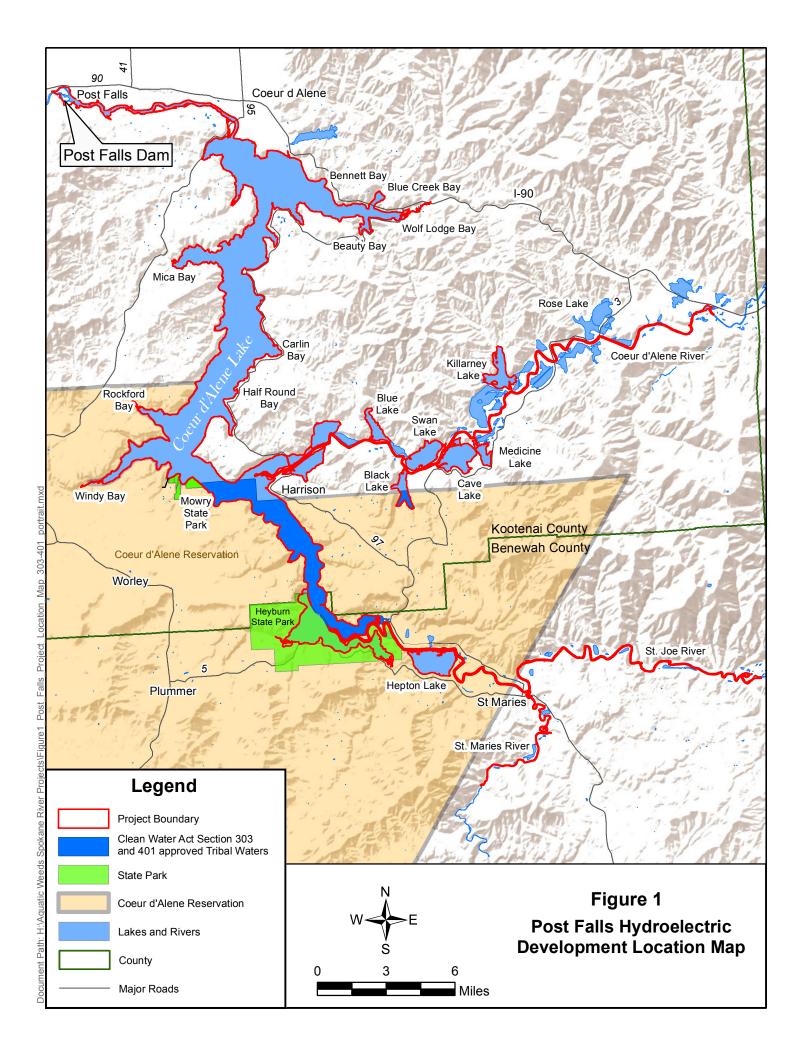
9.0 PROPOSED CHANGES TO THE PLAN

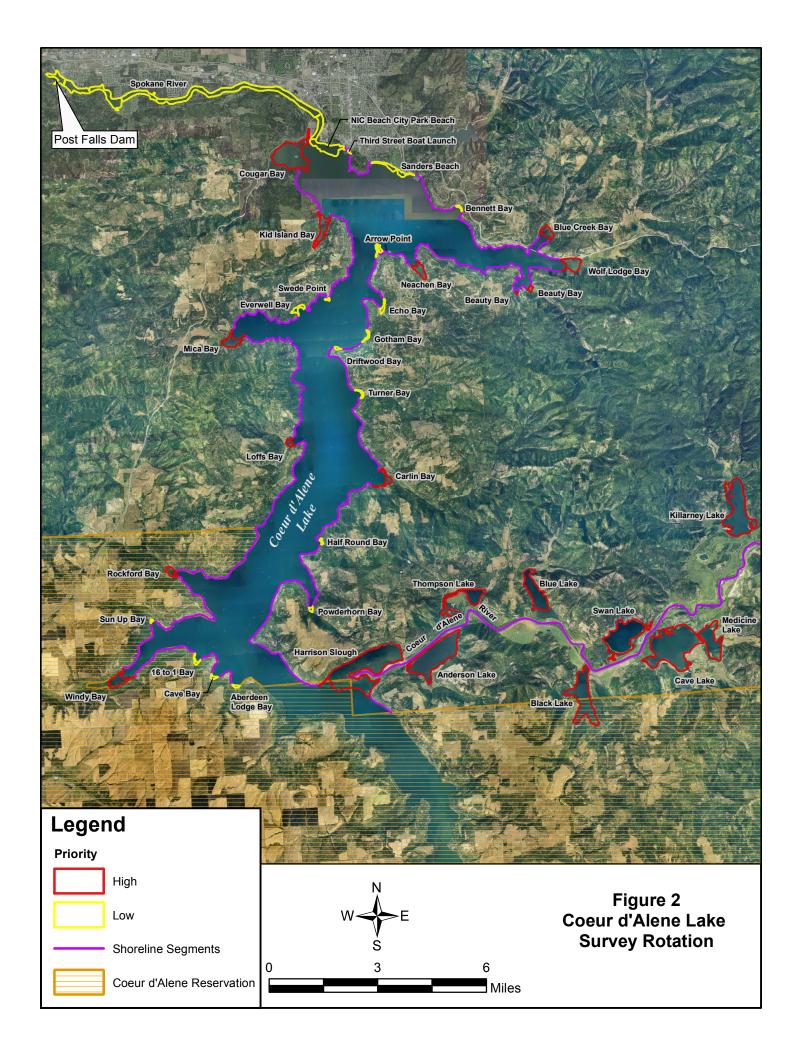
No changes are proposed to the Plan at this time.

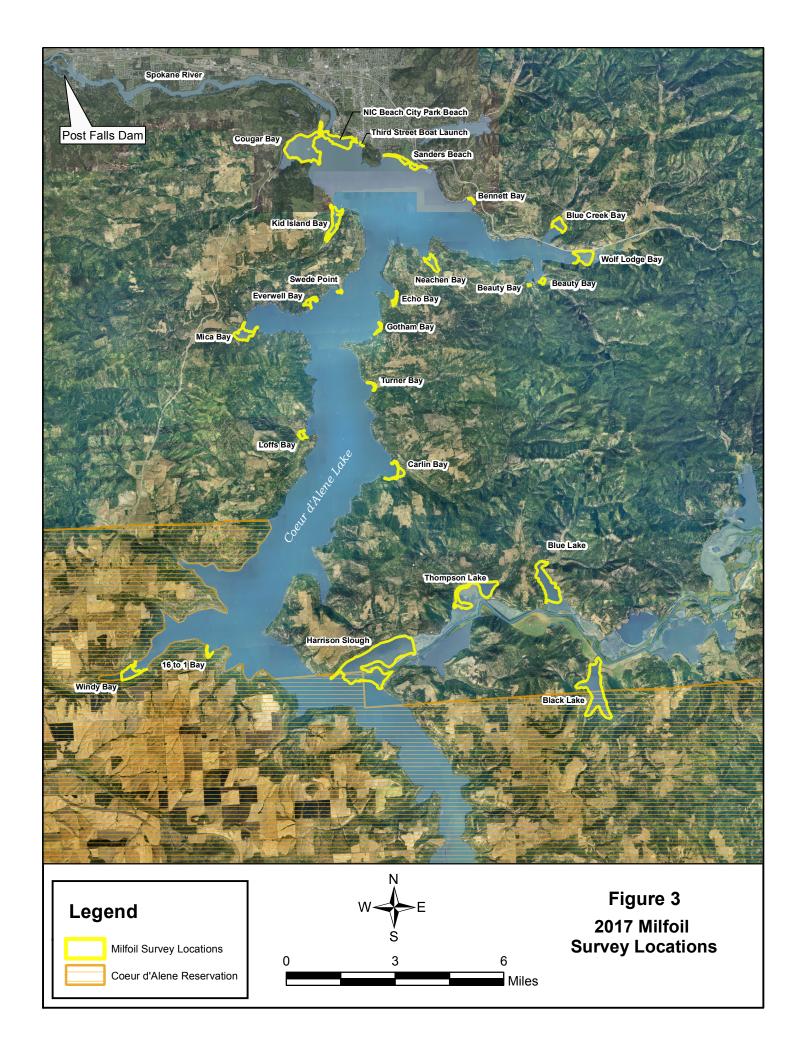
10.0 REFERENCES

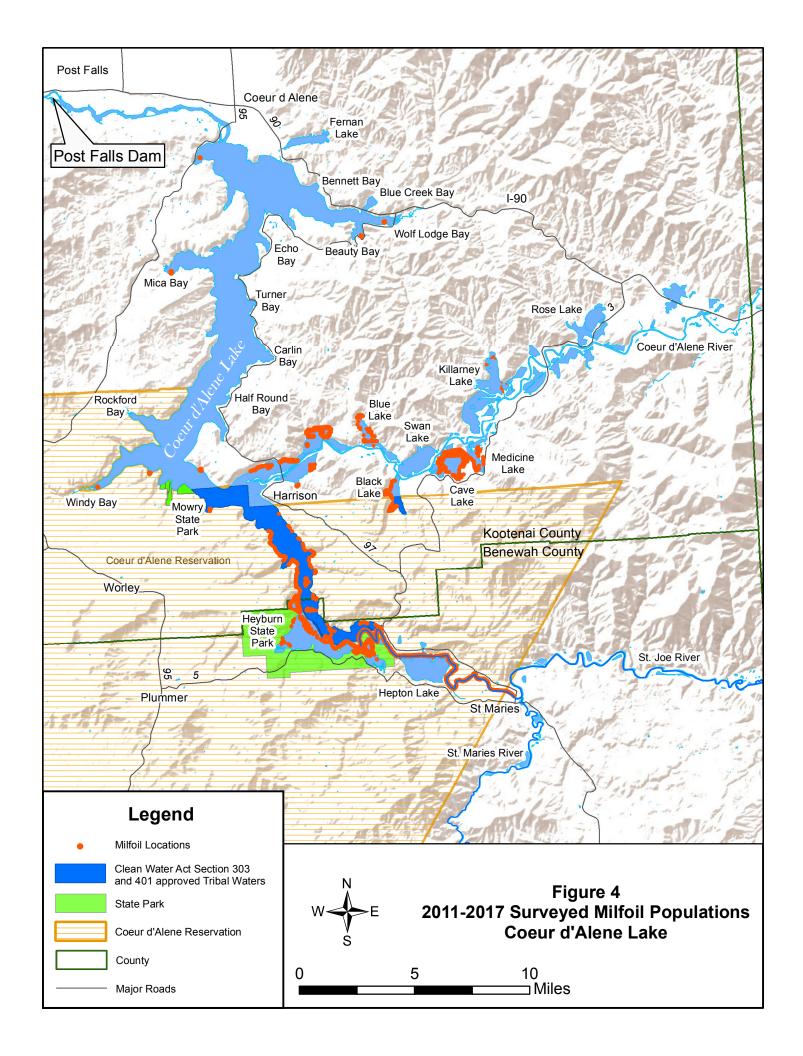
- Avista. 2011. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2011 Summary Report.
- Avista. 2013. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2013 Summary Report.
- Coeur d'Alene Tribe Lake Management Department. 2006. 2006 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.
- Coeur d'Alene Tribe Lake Management Department. 2007 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.
- Coeur d'Alene Tribe Lake Management Department. 2008 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.
- Coeur d'Alene Tribe Lake Management Department. 2009 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.
- Coeur d'Alene Tribe Lake Management Department. 2010 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.











APPENDIX A CONSULTATION RECORD

Avista's Letter to the Idaho Department of Environmental Quality



December 28, 2017

Jamie Brunner Idaho Department of Environmental Quality 2110 Ironwood Parkway Coeur d'Alene, ID 83814

Subject:

Spokane River Project License, FERC Project No. 2545, Article 410, Submittal of the 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report

Dear Ms. Brunner:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License Article 410, Avista developed and submitted a Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) for FERC's approval. FERC approved the Plan on January 19, 2011 allowing Avista to begin implementation.

The Plan requires Avista to submit an annual report that summarizes the activities that it implemented during 2017 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters to the Idaho Department of Environmental Quality (IDEQ), Idaho State Department of Agriculture (ISDA), Kootenai County Noxious Weed Control Board (KCNWCB), and the Coeur d'Alene Tribe for a 30-day review prior to submitting it to FERC for approval. With this, please review the enclosed 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and provide any comments or recommendations that you may have prior to February 1, 2018.

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

Sincerely,

David Armes

Terrestrial Resource Specialist

Enclosure

cc: Kim Holzer, ISDA

Bill Hargrave, KCNWCB

Ben Scofield, Coeur d'Alene Tribe

Speed Fitzhugh, Avista

Idaho Department of Environmental Quality's Comments

From: Jamie.Brunner@deq.idaho.gov

To: Armes, David

Cc: Thomas.Herron@deq.idaho.gov; Glen.Pettit@deq.idaho.gov; Robert.Witherow@deq.idaho.gov

Subject: [External] RE: Coeur d"Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary Report

Date: Thursday, January 04, 2018 8:12:28 AM

image004.ipg image005.ipg image006.ipg

Hi David,

Attachments:

I don't have many technical comments from IDEQ on this draft (just two, first two bullets).

- Second sentence in the second paragraph under 4.0 not sure what it means. Did you mean milfoil fragments?
- Just a little clarification on the following sentence from the third paragraph under 3.0:
 - "Additionally, IDEQ competed surveys in Blue Creek, Bennett, Neachen, Beauty, Kid Island and Wolf Lodge bays. Genus and species groups were identified referencing three field manuals for aquatic plants of North America and Washington State."
 - o We didn't perform the full rake toss survey in these bays-just visual assessments while we were there for our periphyton study. I would suggest indicating we performed "visual surveys" in these bays and deleting the second sentence that begins "Genus and species groups..." Also, "competed" should be "completed."

Others minor editorial suggestions:

- Last bullet in the list beginning of section 2.0-there's an extra "a" before "2017 activities."
- First sentence of the second paragraph under 4.0 "bays" should be capitalized
- Section 8.0 I think 2017 should be 2018.

I like that you captured the Mica Bay concern and the response to it! Let me know if you have any questions on these comments.

Thanks,

Jamie

Jamie Brunner

Coeur d'Alene Lake Management Coordinator Idaho Department of Environmental Quality

2110 Ironwood Parkway

2110 II Oliwood I dikway

Coeur d'Alene, Idaho 83814

Direct Dial (208) 666-4623

Fax (208)769-1404

From: Armes, David [mailto:David.Armes@avistacorp.com]

Sent: Thursday, December 28, 2017 1:15 PM

To: Jamie Brunner

Cc: Fitzhugh, Speed (Elvin); Goloborodko, Yelena

Subject: Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary

Report

Jamie,

Attached for your review is the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary Report and associated cover letter. Please provide any comments you may have prior to February 1, 2018, as we are required to submit this report to FERC prior to March 1, 2018.

Thanks!

David Armes

Terrestrial Resource Specialist



PO Box 3727 MSC-1 Spokane, WA 99220 1411 E Mission MSC-1 Phone 509.495.2796 Cell 208.651.4536 F 509.495.8469 http://www.avistautilities.com



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Idaho Department of Environmental Quality's Comment and Avista's Response

IDEQ Comment #1

Second sentence in the second paragraph under 4.0 – not sure what it means. Did you mean milfoil fragments?

Avista's Response

The sentence was not referring to fragments, but was discussing how milfoil plants may not be visible when growing in dense stands of native vegetation. Section 4.0 was modified to read as follows: Some milfoil plants may have not been visible due to the presence of dense native vegetation, resulting in milfoil being present but not observed or removed.

IDEQ Comment #2

Just a little clarification on the following sentence from the third paragraph under 3.0: "Additionally, IDEQ competed surveys in Blue Creek, Bennett, Neachen, Beauty, Kid Island and Wolf Lodge bays. Genus and species groups were identified referencing three field manuals for aquatic plants of North America and Washington State."

We didn't perform the full rake toss survey in these bays-just visual assessments while we were there for our periphyton study. I would suggest indicating we performed "visual surveys" in these bays and deleting the second sentence that begins "Genus and species groups..." Also, "competed" should be "completed."

Avista's Response

Section 3.0 was modified, changing the wording of rake toss surveys to visual surveys. The second sentence identified above was deleted, and the grammatical change was completed.

IDEO Comment #3

Last bullet in the list beginning of section 2.0-there's an extra "a" before "2017 activities."

Avista's Response

The extra word was deleted.

IDEQ Comment #4

First sentence of the second paragraph under 4.0 – "bays" should be capitalized.

Avista's Response

The word bays was not capitalized to remain consistent with other references.

IDEQ Comment #5

Section 8.0 – I think 2017 should be 2018.

Avista's Response

The date was changed in Section 8.0 from 2017 to 2018.

Avista's Letter to the Idaho State Department of Agriculture



December 28, 2017

Kim Holzer Idaho State Department of Agriculture P.O. Box 790 2270 Old Penitentiary Road Boise, ID 83701

Subject:

Spokane River Project License, FERC Project No. 2545, Article 410, Submittal of the 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report

Dear Ms. Holzer:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License Article 410, Avista developed and submitted a Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) for FERC's approval. FERC approved the Plan on January 19, 2011 allowing Avista to begin implementation.

The Plan requires Avista to submit an annual report that summarizes the activities that it implemented during 2017 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters to the Idaho Department of Environmental Quality (IDEQ), Idaho State Department of Agriculture (ISDA), Kootenai County Noxious Weed Control Board (KCNWCB), and the Coeur d'Alene Tribe for a 30-day review prior to submitting it to FERC for approval. With this, please review the attached 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and provide any comments or recommendations that you may have prior to February 1, 2018.

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

Sincerely

David Armes

Terrestrial Resource Specialist

Enclosure

cc:

Jamie Brunner, IDEQ Bill Hargrave, KCNWCB

Ben Scofield, Coeur d'Alene Tribe

Speed Fitzhugh, Avista

Idaho State Department of Agriculture's Comments

From: Kim Holzer

To: Bill Hargrave; Armes, David

Subject: [External] Re: Summary Report

Date: Friday, January 05, 2018 11:42:42 AM

Attachments: image001.png

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Good Afternoon David,

I have three suggestions/questions outlined below.

(1) In Section 3.0 would you please include Kootenai County and ISDA survey locations? I also think it's important to note the new milfoil detection in Cougar Bay as a priority for removal in 2018.

From: Bill Hargrave shargrave@kcgov.us
Sent: Wednesday, October 25, 2017 11:11 AM

To: Armes, David

Cc: Kim Holzer; Shelby Heiderman; Glen.Pettit@deq.idaho.gov

Subject: Kootenai Lake CDA Survey Results

Kootenai County Noxious Weed Control survey of known populations of Eurasian Water milfoil on Lake Coeur d' Alene. Survey activities consisted of boating to approximate locations and rake throw sampling. Only one location had milfoil in our survey- Harrison Slough. Milfoil population in the Harrison slough is thick. Time did not allow for a more comprehensive survey of the slough. All other locations listed below yielded no milfoil. No GPS or GIS mapping data were plotted.

Survey was conducted on August 7th locations surveyed were:

- Wolf Lodge bay
- Beauty bay
- 16 to 1 bay
- Windy bay
- Mica bay

Here is an analysis of our limited survey.

From: Kim Holzer

Sent: Thursday, October 26, 2017 12:31 PM

To: Armes, David; Bill Hargrave

Cc: Shelby Heiderman; Glen.Pettit@deq.idaho.gov **Subject:** RE: [External] Kootenai Lake CDA Survey Results

Nice one!

We spent three full days on Coeur d'Alene this season by motor boat and canoe and managed to survey milfoil at:

NIC Beach 3rd Street Launch Sanders Beach Bennett Bay

Blue Creek Bay* — to public boat ramp

Wolf Lodge Bay / Wolf Lodge Creek (canoe)

Beauty Bay

Neachen Bay

Echo Bay

Gotham Bay

Turner Bay

Carlin Bay

Harrison Slough (by canoe)

Loffs Bay

Mica Bay* — to public boat ramp

Everwell Bay

Swede Point

Kid Island Bay* — to Peninsula Drive point

Cougar Bay (by canoe)

* Denotes bays where surveys were incomplete nearshore due to shallow water depths. Recommend returning with canoe if comprehensive survey is desired.

To summarize, we have ~200 georeferenced rake samples from Coeur d'Alene Lake and found patches of EWM in Cougar Bay (Oct 8) and Harrison Slough (Oct 25) — no extensive mats. We also found suspect milfoil with \leq 12 leaflet pairs in Wolf Lodge Bay (Oct 25) and native milfoil in Echo Bay (Sep 27). We are still in the process of producing a GIS map to share.

Questions?

Cheers,

Kim

- (2) In Section 9.0 please replace 2017 with 2018.
- (3) How will *Phragmites australis* be incorporated into future managment efforts? Did Avista help support IDFG's David Leptich et al in the 2017 Phragmites delineation project for the CDA River floodplain?

Regards,

K

Kim Holzer, Ph.D.

Agriculture Program Specialist — North Idaho Invasive Species and Noxious Weeds Idaho State Department of Agriculture 9699 Government Way

Hayden, ID 83835

Email: Kim.Holzer@isda.idaho.gov

Mobile: (208) 580-4254 or (434) 249-5824

http://invasivespecies.idaho.gov/invasivespecies-overview/

From: Bill Hargrave
 shargrave@kcgov.us> Sent: Thursday, January 4, 2018 10:15 AM

To: 'Armes, David'; Kim Holzer **Subject:** RE: Summary Report

Hi,

Kootenai County has received it and will be reviewing and commenting on it by the time line stated.

Thanks for the update.

Bill Hargrave

From: Armes, David [mailto:David.Armes@avistacorp.com]

Sent: Wednesday, January 03, 2018 2:47 PM

To: Kim Holzer <Kim.Holzer@ISDA.IDAHO.GOV>; Bill Hargrave
bhargrave@kcgov.us>

Subject: Summary Report

Hey guys Happy New Year! Wanted to check in to see if you received the report I sent as it was a large file?

Thanks!

David Armes

Terrestrial Resource Specialist



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Idaho State Department of Agriculture's Comment and Avista's Response

ISDA Comment #1

(1) In Section 3.0 would you please include Kootenai County and ISDA survey locations? I also think it's important to note the new milfoil detection in Cougar Bay as a priority for removal in 2018.

Avista's Response

Section 3.0 was modified to include the Kootenai County and ISDA survey locations and results.

Section 8.0 was modified as follows: Management options for milfoil populations in Harrison Slough and Cougar Bay will be discussed with the Cooperating Parties as a priority in 2018. Due to the amount of milfoil in Harrison Sough, the preferred management option is likely an herbicide treatment. Only a few patches of milfoil were identified in Cougar Bay, therefore the preferred management option is likely diver hand pulling. These will be discussed and determined by the Cooperating Parties during the annual meeting.

ISDA Comment #2

In Section 9.0 please replace 2017 with 2018.

Avista's Response

The date in Section 8.0 was changed.

ISDA Comment #3

How will *Phragmites australis* be incorporated into future management efforts? Did Avista help support IDFG's David Leptich et al in the 2017 Phragmites delineation project for the CDA River floodplain?

Avista's Response

Phragmites is considered a terrestrial species and is not included under this Plan. Avista partnered with IDFG in the 2017 Phragmites evaluation. Avista will review the report with IDFG in 2018 and include ISDA in any discussions or meetings.

Avista's Letter to the Coeur d'Alene Tribe



December 28, 2017

Ben Scofield Coeur d'Alene Tribe P.O. Box 408 / 850 A Street Plummer, ID 83851

Subject:

Spokane River Project License, FERC Project No. 2545, Article 410, Submittal of the 2017 Coeur d'Alene Lake Aquatic Weed Management Plan

for Non-Tribal Waters Summary Report

Dear Mr. Scofield:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License Article 410, Avista developed and submitted a Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) for FERC's approval. FERC approved the Plan on January 19, 2011 allowing Avista to begin implementation.

The Plan requires Avista to submit an annual report that summarizes the activities that it implemented during 2017 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters to the Idaho Department of Environmental Quality (IDEQ), Idaho State Department of Agriculture (ISDA), Kootenai County Noxious Weed Control Board (KCNWCB), and the Coeur d'Alene Tribe for a 30-day review prior to submitting it to FERC for approval. With this, please review the enclosed 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and provide any comments or recommendations that you may have prior to February 1, 2018.

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

Sincerely.

David Armes
Terrestrial Resource Specialist

Enclosure

cc:

Jamie Brunner, IDEQ Kim Holzer, ISDA Bill Hargrave, KCNWCB Speed Fitzhugh, Avista

The Coeur d'Alene Tribe did not provide comments on the Report.

Avista's Letter to Kootenai County Noxious Weed Control Board



December 28, 2017

Bill Hargrave Kootenai County Noxious Weed Control 10905 N. Ramsey Rd. Hayden, ID 83835

Subject:

Spokane River Project License, FERC Project No. 2545, Article 410, Submittal of the 2017 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report

Dear Mr. Hargrave:

In accordance with the Federal Energy Regulatory Commission's (FERC) June 18, 2009 Spokane River Hydroelectric Project (No. 2545) License Article 410, Avista developed and submitted a Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) for FERC's approval. FERC approved the Plan on January 19, 2011 allowing Avista to begin implementation.

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Sincerely

David Armes

Terrestrial Resource Specialist

Enclosure

cc:

Jamie Brunner, IDEQ

Kim Holzer, ISDA

Ben Scofield, Coeur d'Alene Tribe

Speed Fitzhugh, Avista

Kootenai County Noxious Weed Control Board's Response

From: Bill Hargrave
To: Armes, David

Subject: [External] RE: Coeur d"Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary Report

Date: Wednesday, January 24, 2018 12:58:20 PM

Attachments: image001.png

image002.png image003.png

Hello,

We have no comments as of this time.

Thank you for all your efforts.

Bill Hargrave

From: Armes, David [mailto:David.Armes@avistacorp.com]

Sent: Thursday, December 28, 2017 1:30 PM **To:** Bill Hargrave

 shargrave@kcgov.us>

Cc: Fitzhugh, Speed (Elvin) < SpeedElvin. Fitzhugh@avistacorp.com>; Goloborodko, Yelena

<Yelena.Goloborodko@avistacorp.com>

Subject: Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary

Report

Bill,

Attached for your review is the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2017 Summary Report and associated cover letter. Please provide any comments you may have prior to February 1, 2018, as we are required to submit this report to FERC prior to March 1, 2018.

Thanks!

David Armes

Terrestrial Resource Specialist



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