



April 19, 2012

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Subject: Spokane River Hydroelectric Project, FERC Project No. 2545
Submission of the Lake Spokane Boat-in-Only Campsite Locations
Per FERC's October 24, 2011 Order**

Dear Secretary Bose:

The Federal Energy Regulatory Commission (FERC) issued an Order on October 24, 2011 (Order) to Avista Corporation (Avista) Modifying and Approving the Recreation Plan and Trailer Park Wave Access Site Assessment Pursuant to Articles 416 and 417 of the Spokane River Project (FERC No. 2545) License. The Order requires Avista to file, for Commission approval, a map that identifies the final locations of the Lake Spokane boat-in-only campsites in relation to the FERC Project boundary.

In accordance with Paragraph C of the Order, Avista submitted proposed locations for the boat-in-only campsites to the Washington Department of Fish and Wildlife (WDFW), Washington State Parks and Recreation Commission (WSP), Washington Department of Natural Resources (DNR), and the U.S. Fish and Wildlife Service (FWS), for a 30-day review and comment period. WDFW, WSP and DNR were the only agencies that provided comments on the boat-in-only campsite locations. We subsequently revised the boat-in-only campsite map and completed the enclosed "*Wetland and Nesting Wood Duck Habitat Evaluation for the Lake Spokane Boat-In-Only Campsite*" (Report) in response to WDFW's comments. We have enclosed the final map, Report and the consultation record, which includes our request for comments, the agencies' comments, and our responses, as part of this filing.

Avista plans to begin designing and constructing the boat-in-only campsites once FERC approves the final locations indicated on the final map. Within 90 days following completion of the boat-in-only campsites, Avista will file for FERC approval, as-built drawings consistent with paragraph F of the Order and location point data for each of the campsites that comply with the National Map Accuracy Standards for maps at a 1:24,000 scale.

Please feel free to contact either me or Rene' Wiley if you have any questions or wish to discuss the locations for the boat-in-only campsites. I can be reached at (509) 495-4998 and Rene' can be reached at (509) 495-2919.

Sincerely,

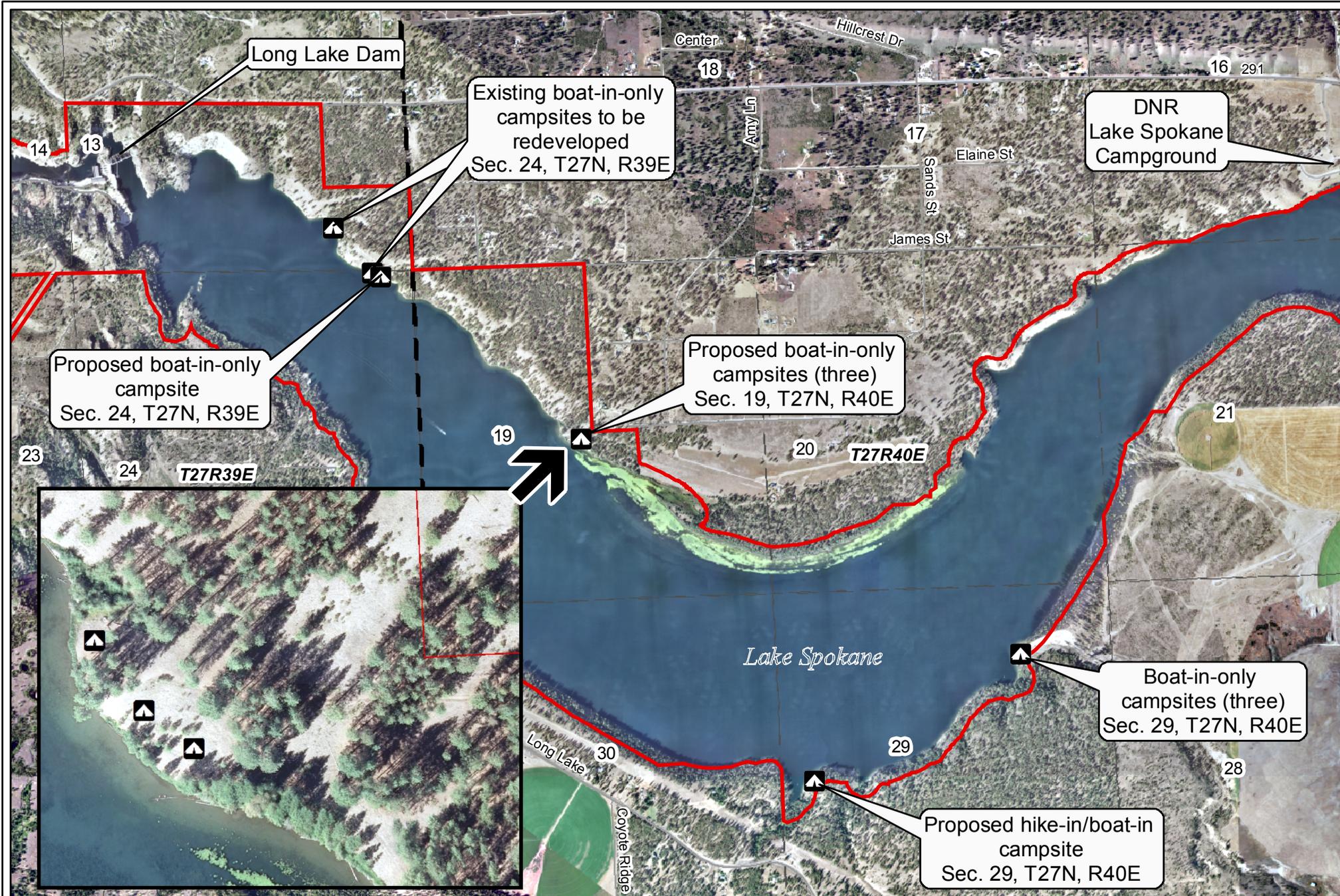
Elvin "Speed" Fitzhugh
Spokane River License Manager

Enclosures: (1) Final Boat-in-Only Campsite Location Map
(2) Wetland and Nesting Wood Duck Habitat Evaluation for
the Lake Spokane Boat-In-Only Campsite
(3) Consultation Record

cc: Graham Simon, WDFW
Chris Guidotti, WSP
Brett Walker, DNR
Erin Kuttel, FWS



Environmental Affairs



Legend

- Boat-in-Only Campsites
- Project Boundary
- Township Range
- Sections



Spokane River Project
FERC Project No. 2545
Lake Spokane
Boat-in-Only
Campsite Locations

1 inch = 2,000 feet



4/2012

AVISTA CORPORATION

WETLAND AND NESTING WOOD DUCK HABITAT EVALUATION FOR THE LAKE SPOKANE BOAT-IN-ONLY CAMPSITE

Prepared By:



April 4, 2012

The Lake Spokane boat-in-only campsite cluster located in Township 27 North, Range 40 East, in Section 19 was field reviewed on February 3, 2012 by Avista employee David Armes, certified Wetland Biologist, and again on March 21, 2012 by David Armes and Rene' Wiley. Avista conducted the field reviews in response to the Washington Department of Fish and Wildlife (WDFW) comments and request for additional information to insure the campsite cluster was not located within or directly adjacent to wetlands or wood duck nesting habitat.

Wetlands

The WDFW Priority Habitat and Species (PHS) maps identify lacustrine littoral aquatic bed wetlands within the vicinity of the proposed location for the campsite cluster. However, the field visit confirmed the proposed campsite cluster is located outside of any wetland area and will be located in an upland area dominated by upland species (Photograph 1). The submerged portion of the shoreline is relatively steep adjacent to the proposed area, is almost exclusively lined with the invasive yellow flag iris (*Iris pseudacorus*) and does not contain any additional emergent wetland vegetation (Photograph 2). Although the WDFW PHS database map indicates the wetland extends to the proposed campsite locations the actual field based assessment determined the campsite cluster is not located within any known wetlands and will not result in the fill of any wetlands. It is important to note that the PHS database website acknowledges location accuracy may be up to one mile off.

Wood Duck (*Aix sponsa*) Nesting Habitat

The WDFW PHS data maps cavity nesting duck habitat (including wood-duck nesting habitat) in the Woody Slough area of Lake Spokane. The mapped wood duck nesting habitat is located over 400 yards away from the proposed cluster of campsites. Wood ducks nest primarily in late-successional forests and riparian areas adjacent to low gradient rivers, sloughs, lakes, and beaver ponds. Specific nesting locations are almost exclusively in tree cavities, which offer protection from weather and predators. They are secondary cavity nesters, using cavities created by large woodpeckers or by decay or damage to the tree. Shallow wetlands with 50-75% overhanging woody vegetation and/or emergent vegetation for brood escape cover provide optimal brood habitat for wood ducks (Larsen et. al. 2004).

No existing nests or potential nests for wood ducks were identified in the vicinity of the proposed location. The cluster of campsites is located in an upland area dominated by secondary growth ponderosa pine (*Pinus ponderosa*) trees. The adjacent shoreline is relatively steep and does not contain shallow wetland areas, emergent vegetation or significant overhanging woody vegetation. The shoreline is almost exclusively lined with yellow flag iris (*Iris pseudacorus*). The habitat type present at the proposed cluster of campsites is the same or similar habitat type abundant along a majority of the Lake Spokane shoreline and does not appear to be suitable wood duck nesting habitat. The proposed cluster of campsites is located outside of any known wood duck nesting habitat and will not have any significant effect on wood duck habitat.

Reference:

E. Larsen, J. M. Azerrad, N. Nordstrom, editors. 2004. Management recommendations for Washington's priority species, Volume IV: Birds. Washington Department of Fish and Wildlife, Olympia, Washington, USA.

Photograph 1. Proposed Location



Photograph 2. Typical Shoreline at the Proposed Location



AVISTA CORPORATION

BOAT-IN-ONLY CAMPSITE LOCATIONS

CONSULTATION RECORD

April 19, 2012

Washington Department of Fish and Wildlife Comments and Avista Responses



February 9, 2012

Doug Robison
Washington Department of Fish and Wildlife
2315 N Discovery Place
Spokane Valley, WA 99216

RE: Spokane River Project Recreation Plan Submittal of Lake Spokane Boat-in-Only Campsite Locations as Required by FERC October 24, 2011 Order

Dear Mr. Robison,

The Spokane River Project Recreation Plan (Plan) was approved by the Federal Energy Regulatory Commission (FERC) on October 24, 2011. The order approving the Plan requires Avista to consult with the Washington State Parks and Recreation Commission (WSPRC), Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (WDNR), and the U.S. Fish and Wildlife Service (USFWS) regarding the final locations of the proposed boat-in-only campsites on Lake Spokane.

The attached map identifies the proposed locations for the ten semi-developed boat-in-only campsites. You will notice that the sites will be developed primarily in clusters, and that the two existing sites will be enhanced and/or redeveloped. All of these locations currently experience frequent and regular dispersed recreational use during the summer season, and will benefit greatly by containing the impact zones and from the limited development. Each cluster of sites will include a short floating boat dock, toilet, picnic tables and fire rings. As you know, the shoreline along the downstream end of Lake Spokane is fairly undeveloped; the clustering of campsites will help maintain the scenic quality of the Lake and minimize the disturbance of natural resources and the shoreline. Avista considered the FERC approved Bald Eagle Management Plan when determining the location of the boat-in-only campsites, and determined there are currently no nests in the vicinity of any of the sites at this time. However, if new nests are discovered, Avista will adhere to FERC approved Spokane River Project Bald Eagle Management Plan's requirements.

All of the proposed boat-in-only sites will be located on Avista property that has been designated "Public Recreation Lands" in accordance with the FERC approved Spokane River Land Use Management Plan, which was developed in consultation with WSPRC, WDFW, WDNR, USFW, and others. Avista is currently negotiating a management agreement with WSPRC to manage and operate the boat-in-only campsites once they are developed. If future demand and use figures indicate the need for additional boat-in-only campsites, or if WSPRC further develops its Lake Spokane Property, Avista will consider working with them to add additional sites.

Please review and provide any comments or recommendations on the boat-in-only site locations to me by March 12, 2012. After consultation, we are required to submit the final boat-in-only campsite locations to FERC for approval.

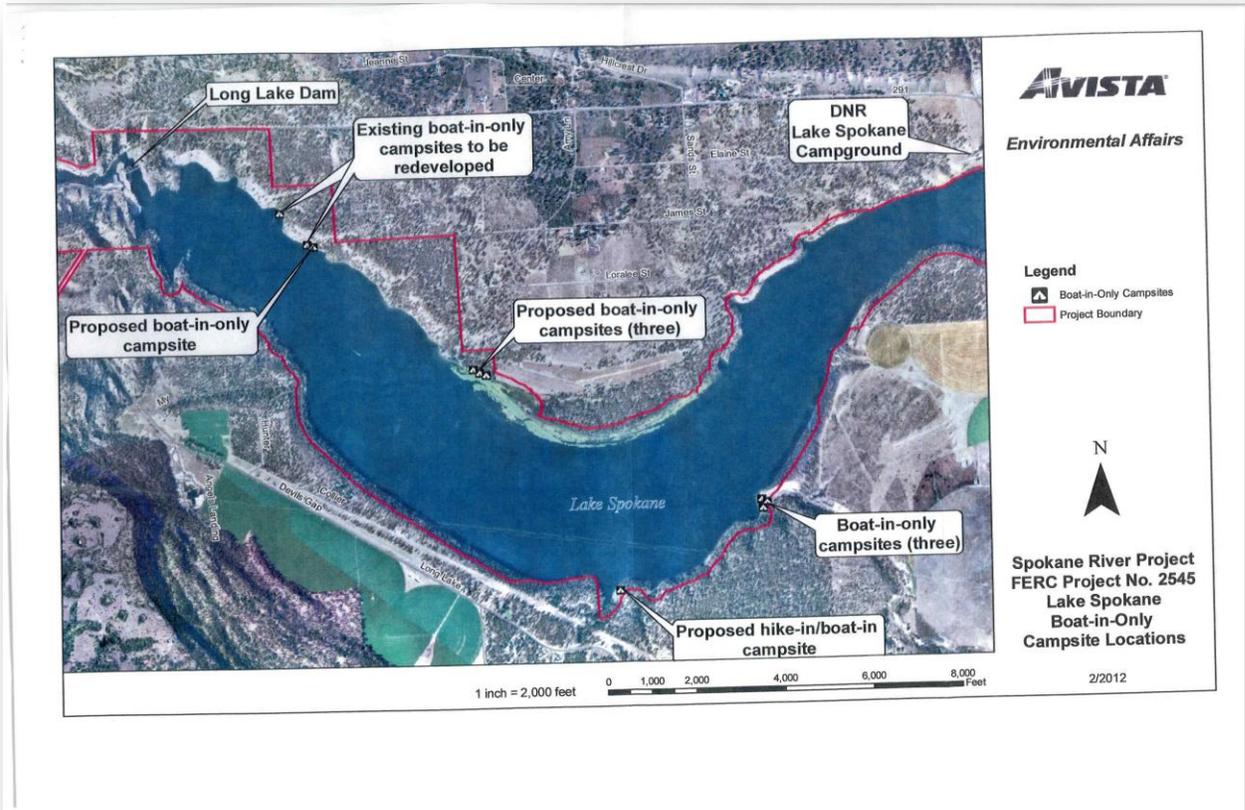
If you have any questions or concerns, feel free to call me at (509) 495-2919.

Sincerely,

Reple Wiley
Recreation, Land Use and Cultural Resource Specialist

Enclosure

Washington Department of Fish and Wildlife Comments and Avista Responses



Washington Department of Fish and Wildlife Comments and Avista Responses

Wiley, Rene

Subject: Lake Spokane Boat-in-Only Campsite locations

From: Robison, Douglas L (DFW) [mailto:Douglas.Robison@dfw.wa.gov]

Sent: Monday, February 13, 2012 1:42 PM

To: Wiley, Rene

Subject: RE: Lake Spokane Boat-in-Only Campsite locations

Hi Rene,

Thanks for sending these to me. After looking at the locations, I was wondering if WDFW's PHS database was searched for state sensitive species and habitats in those areas. Please let me know.

Thanks,

Doug Robison

Renewable Energy Team Lead
Habitat Program
Washington Department of Fish and Wildlife
2315 North Discovery Place
Spokane Valley, WA 99216

(509) 892-1001 x322
(509) 703-2146 cell

1411 East Mission MSC-1
P.O. Box 3727
Spokane, WA 99220-3727
Direct Line (509) 495-2919

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Washington Department of Fish and Wildlife Comments and Avista Responses

Wiley, Rene

Subject: Lake Spokane Boat-in-Only Campsite locations

From: Wiley, Rene
Sent: Friday, February 24, 2012 4:42 PM
To: Robison, Douglas L (DFW)
Subject: Lake Spokane Boat-in-Only Campsite locations

Hello Doug,

Thank you for your review and comment on the Lake Spokane boat-in-only campsite locations. I reviewed the information posted on WDFW's PHS (Priority Habitat Species) database as well as the Spokane River Hydroelectric Project Sensitive, Threatened and Endangered Plant Survey that was completed by Parametrix in 2003, and the Spokane River Wetland and Riparian Habitat Mapping and Assessment Report completed by Parametrix in 2004.

The reports indicate that there are no sensitive, threatened and endangered species present at the proposed boat-in-only campsite locations.

One cluster of three boat-in-only campsites on the north shore of the lake is located south of Amy Lane and downstream of an area identified on WDFW's PHS database as a Lacustrine Littoral wetland type. This area is commonly referred to as the Woody Slough. The small cluster of campsites is not located within but is adjacent to the wetlands identified in the PHS database, at a location that is currently used as an informal boating, camping, and swimming area. Our wetland biologist, David Armes has reviewed the information and determined the development of the campsites at this location will not disturb the wetland area, which consists primarily of non-native species, particularly yellow floating heart (*Nymphoides peltata*), fragrant water lily (*Nymphaea odorata*) and Eurasian milfoil (*Myriophyllum spicatum*). Avista's Lake Spokane Aquatic Weed Management Plan (AWMP) identifies these species for weed control in and around public recreation sites. Once the campsites are developed to address their current level of use and to minimize other resource impacts, Avista will monitor and as necessary implement control measures of these noxious weeds in a manner consistent with the other public access sites on the lake.

If you have any questions or concerns, please give me a call.
Thank you,

Rene'

*Rene' Wiley
Recreation, Land Use and Cultural Resource Specialist
Avista Corporation
1411 East Mission MSC-1
P.O. Box 3727
Spokane, WA. 99220-3727
Direct Line (509) 495-2919*

Washington Department of Fish and Wildlife Comments and Avista Responses

Comment:

February 13, 2012 e-mail from Doug Robison, WDFW.

After looking at the locations, I was wondering if WDFW's PHS database was searched for state sensitive species and habitats in those areas. Please let me know.

Avista Response:

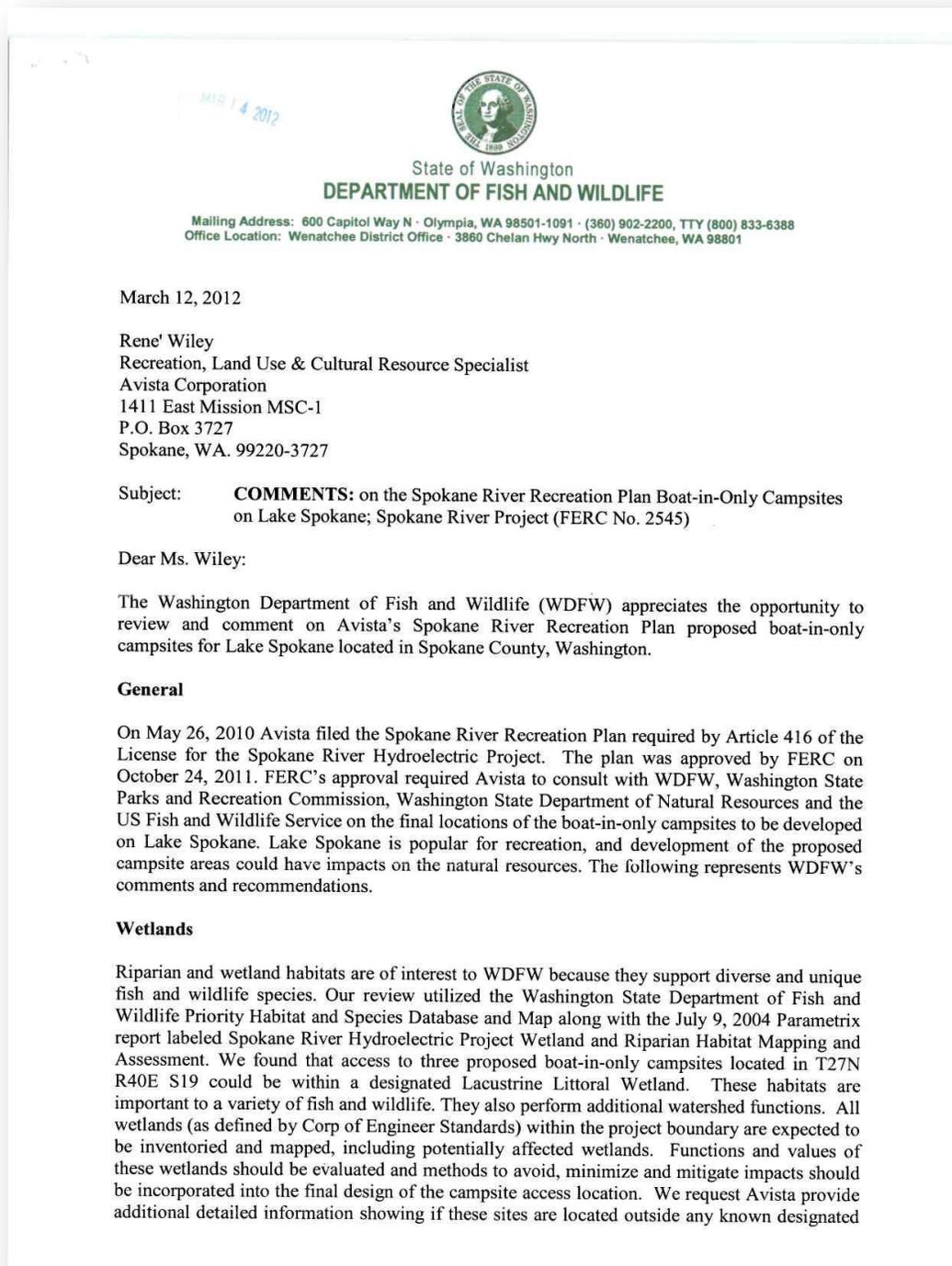
February 24, 2012 e-mail from Rene' Wiley, Avista Recreation and Land Use Specialist.

Thank you for your review and comment on the Lake Spokane boat-in-only campsite locations. I reviewed the information posted on WDFW's PHS (Priority Habitat Species) database as well as the Spokane River Hydroelectric Project Sensitive, Threatened and Endangered Plant Survey that was completed by Parametrix in 2003, and the Spokane River Wetland and Riparian Habitat Mapping and Assessment Report completed by Parametrix in 2004.

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Washington Department of Fish and Wildlife Comments and Avista Responses



Washington Department of Fish and Wildlife Comments and Avista Responses

Avista Boat-In-Only Campsite
March 12, 2012
Page 2

wetlands. If the access sites are located in a designated wetland, we recommend that sites be relocated outside this high value habitat.

Waterfowl

The forest and riparian habitat areas surrounding Lake Spokane and the Spokane River are relatively undisturbed and much of the shoreline provides habitat for a variety of native wildlife species. The Lake Spokane area is used by many species including waterfowl, small mammals, reptiles, amphibians, cavity-nesting birds, raptors, and a variety of songbirds. After review of the Washington State Department of Fish and Wildlife Priority Habitat and Species Database and Maps, WDFW found that the three campsites located in T27N R40E S19 are within the vicinity of Wood duck nesting and brood habitat. The location of most concern is the riparian and emergent wetland habitats along the shoreline near the proposed sites. We request Avista provide additional detailed information showing if these sites are located outside any known Wood Duck nesting habitat. If the boat-in campsites are found to be located within this habitat type, we recommend Avista work with WDFW to relocate the sites, mitigate for disturbance with timing restrictions, or do cavity-nesting duck habitat enhancement projects in appropriate areas.

In conclusion, WDFW appreciates the opportunity to comment and looks forward to working with the Avista staff for continued coordination and consultation as the project progresses forward.

Please contact me should you have any questions or comments.

Sincerely,



Graham Simon
Renewable Energy Habitat Biologist

cc: Travis Nelson, Habitat Program Manager Energy & Major Projects, WDFW Olympia
Doug Robison, Renewable Energy Eastside Team Lead, WDFW Spokane
Howard Ferguson, District Wildlife Biologist, WDFW Spokane

Washington Department of Fish and Wildlife Comments and Avista Responses

Comment:

March 12, 2012 letter from Graham Simon, WDFW.

We request Avista provide additional detailed information showing if these sites are located outside any known designated wetlands. If the access sites are located in designated wetland, we recommend the sites be relocated outside this high value habitat.

Avista Response:

Avista provided additional information in a February 24, 2012 e-mail to Doug Robison, WDFW.

The location map showing the cluster of three campsites on the North Shore of Lake Spokane has been revised to clarify the location of the campsites in relation to the WDFW identified wetland, which is located upstream of the final campsite locations. Avista's Wetland Biologist, David Armes, conducted an on-site evaluation of the proposed campsite locations and determined that the campsites are not located in any designated wetland area. Please see the attached Wetland and Nesting Wood Duck Habitat Evaluation Report prepared by David Armes.

Comment:

We request Avista provide additional detailed information showing if these sites are located outside any known Wood Duck nesting habitat. If the boat-in campsites are found to be located within this habitat type, we recommend Avista work with WDFW to relocate the sites, mitigate for disturbance with timing restrictions, or do cavity-nesting duck habitat enhancement projects in appropriate areas.

Avista Response:

The location map showing the cluster of three campsites on the North Shore of Lake Spokane has been revised to clarify the location of the campsites in relation to the WDFW identified wetland, which is located upstream of the final campsite locations. Avista's Wetland Biologist, David Armes, conducted an on-site evaluation of the proposed campsite locations and determined that the campsites are not located in a designated wetland area, or Wood Duck nesting habitat. The Wood Duck nesting habitat is located upstream and adjacent to the campsite location. Please see the attached Wetland and Nesting Wood Duck Habitat Evaluation Report prepared by David Armes.

Washington State Department of Natural Resources Comment and Avista Response



February 9, 2012

Brett Walker
Department of Natural Resources
225 S Silke Road
Colville, WA 99114-0190

RE: Spokane River Project Recreation Plan Submittal of Lake Spokane Boat-in-Only Campsite Locations as Required by FERC October 24, 2011 Order

Dear Mr. Walker,

The Spokane River Project Recreation Plan (Plan) was approved by the Federal Energy Regulatory Commission (FERC) on October 24, 2011. The order approving the Plan requires Avista to consult with the Washington State Parks and Recreation Commission (WSPRC), Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (WDNR), and the U.S. Fish and Wildlife Service (USFWS) regarding the final locations of the proposed boat-in-only campsites on Lake Spokane.

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All of the proposed boat-in-only sites will be located on Avista property that has been designated "Public Recreation Lands" in accordance with the FERC approved Spokane River Land Use Management Plan, which was developed in consultation with WSPRC, WDFW, WDNR, USFW, and others. Avista is currently negotiating a management agreement with WSPRC to manage and operate the boat-in-only campsites once they are developed. If future demand and use figures indicate the need for additional boat-in-only campsites, or if WSPRC further develops its Lake Spokane Property, Avista will consider working with them to add additional sites.

Please review and provide any comments or recommendations on the boat-in-only site locations to me by March 12, 2012. After consultation, we are required to submit the final boat-in-only campsite locations to FERC for approval.

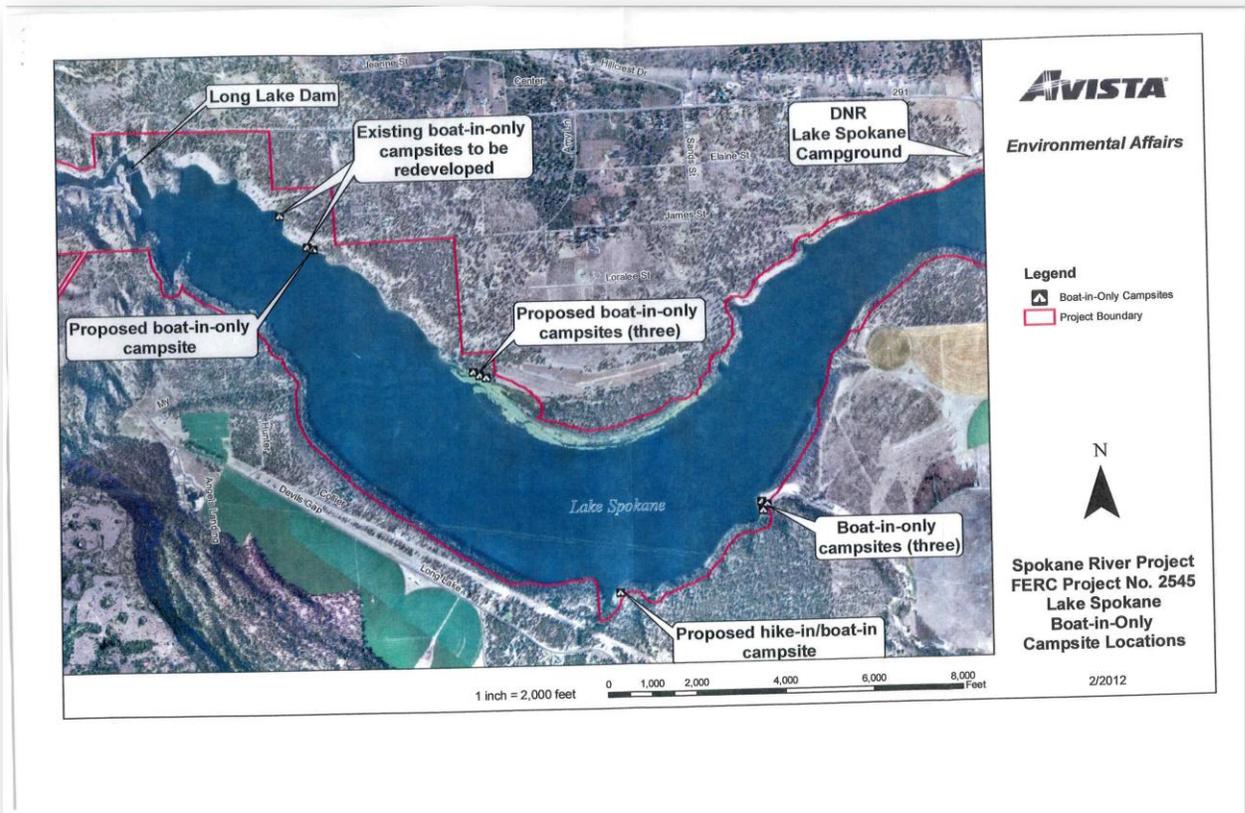
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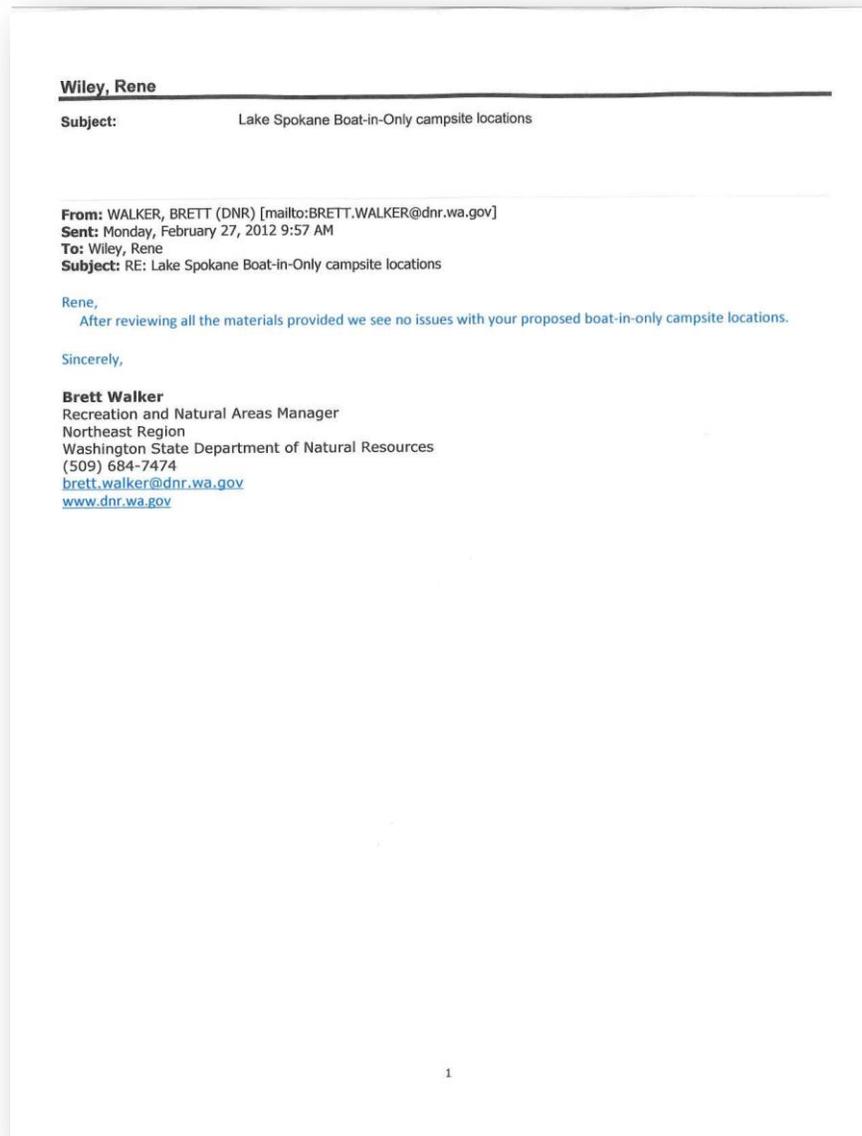

Rene Wiley
Recreation, Land Use and Cultural Resource Specialist

Enclosure

Washington State Department of Natural Resources Comment and Avista Response



Washington State Department of Natural Resources Comment and Avista Response



Comment:

After reviewing the material provided we see no issues with your proposed boat-in-only campsite locations.

Avista Response:

We appreciate the positive relationship that we have with the Washington State Department of Natural Resources and look forward to working with them on recreational improvements.

Washington State Parks Comment and Avista Response



February 9, 2012

Tom Ernsberger
Washington State Parks and Recreation Commission
270 9th Street N.E. Suite 200
East Wenatchee, WA 98802

RE: Spokane River Project Recreation Plan Submittal of Lake Spokane Boat-in-Only Campsite Locations as Required by FERC October 24, 2011 Order

Dear Mr. Ernsberger,

The Spokane River Project Recreation Plan (Plan) was approved by the Federal Energy Regulatory Commission (FERC) on October 24, 2011. The order approving the Plan requires Avista to consult with the Washington State Parks and Recreation Commission (WSPRC), Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (WDNR), and the U.S. Fish and Wildlife Service (USFWS) regarding the final locations of the proposed boat-in-only campsites on Lake Spokane.

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Please review and provide any comments or recommendations on the boat-in-only site locations to me by March 12, 2012. After consultation, we are required to submit the final boat-in-only campsite locations to FERC for approval.

If you have any questions or concerns, feel free to call me at (509) 495-2919.

Sincerely,

Reje' Wiley
Recreation, Land Use and Cultural Resource Specialist

Enclosure

Washington State Parks Comment and Avista Response



February 9, 2012

Chris Guidotti
Riverside State Park Ranger Station
9711 Charles Road
Nine Mile Falls, WA 99026

RE: Spokane River Project Recreation Plan Submittal of Lake Spokane Boat-in-Only Campsite Locations as Required by FERC October 24, 2011 Order

Dear Mr. Guidotti,

The Spokane River Project Recreation Plan (Plan) was approved by the Federal Energy Regulatory Commission (FERC) on October 24, 2011. The order approving the Plan requires Avista to consult with the Washington State Parks and Recreation Commission (WSPRC), Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (WDNR), and the U.S. Fish and Wildlife Service (USFWS) regarding the final locations of the proposed boat-in-only campsites on Lake Spokane.

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Please review and provide any comments or recommendations on the boat-in-only site locations to me by March 12, 2012. After consultation, we are required to submit the final boat-in-only campsite locations to FERC for approval.

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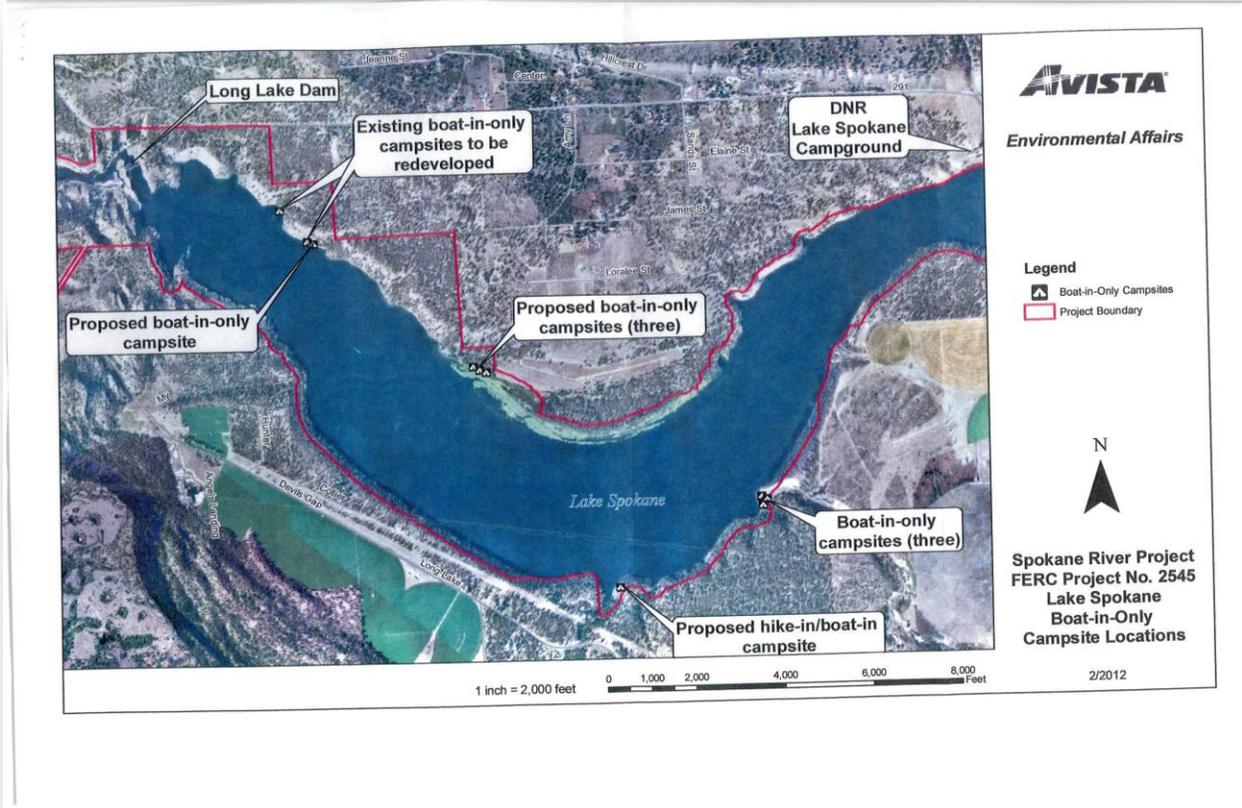
Sincerely,

A handwritten signature in cursive script that reads "Rene' Wiley".

Rene' Wiley
Recreation, Land Use and Cultural Resource Specialist

Enclosure

Washington State Parks Comment and Avista Response



Washington State Parks Comment and Avista Response

Wiley, Rene

Subject: Boat-in-only campsite locations

From: Guidotti, Chris (PARKS) [mailto:Chris.Guidotti@PARKS.WA.GOV]

Sent: Thursday, April 05, 2012 3:02 PM

To: Wiley, Rene

Subject: RE: Boat-in-only campsite locations

Rene',

After reviewing the proposed locations for boat in sites on Lake Spokane, State Parks supports the proposed locations and looks forward to working with Avista to successfully manage these new recreational opportunities.

Chris Guidotti
Riverside Area Manager
9711 W Charles Rd.
Nine Mile Falls, WA 99026
(509) 465-5064

1

Comment:

After reviewing the proposed locations for boat in sites on Lake Spokane, State Parks supports the proposed location and look forward to working with Avista to successfully manage these new recreational opportunities.

Avista Response:

We appreciate the positive working relationship we have with Washington State Parks and look forward to working with Parks on future recreational improvements.

U.S. Fish and Wildlife Comment and Avista Response



February 9, 2012

Mark Miller
U.S. Fish and Wildlife Service
11103 E. Montgomery Drive, Suite 2
Spokane, WA 99206

RE: Spokane River Project Recreation Plan Submittal of Lake Spokane Boat-in-Only Campsite Locations as Required by FERC October 24, 2011 Order

Dear Mr. Miller,

The Spokane River Project Recreation Plan (Plan) was approved by the Federal Energy Regulatory Commission (FERC) on October 24, 2011. The order approving the Plan requires Avista to consult with the Washington State Parks and Recreation Commission (WSPRC), Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (WDNR), and the U.S. Fish and Wildlife Service (USFWS) regarding the final locations of the proposed boat-in-only campsites on Lake Spokane.

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All of the proposed boat-in-only sites will be located on Avista property that has been designated "Public Recreation Lands" in accordance with the FERC approved Spokane River Land Use Management Plan, which was developed in consultation with WSPRC, WDFW, WDNR, USFW, and others. Avista is currently negotiating a management agreement with WSPRC to manage and operate the boat-in-only campsites once they are developed. If future demand and use figures indicate the need for additional boat-in-only campsites, or if WSPRC further develops its Lake Spokane Property, Avista will consider working with them to add additional sites.

Please review and provide any comments or recommendations on the boat-in-only site locations to me by March 12, 2012. After consultation, we are required to submit the final boat-in-only campsite locations to FERC for approval.

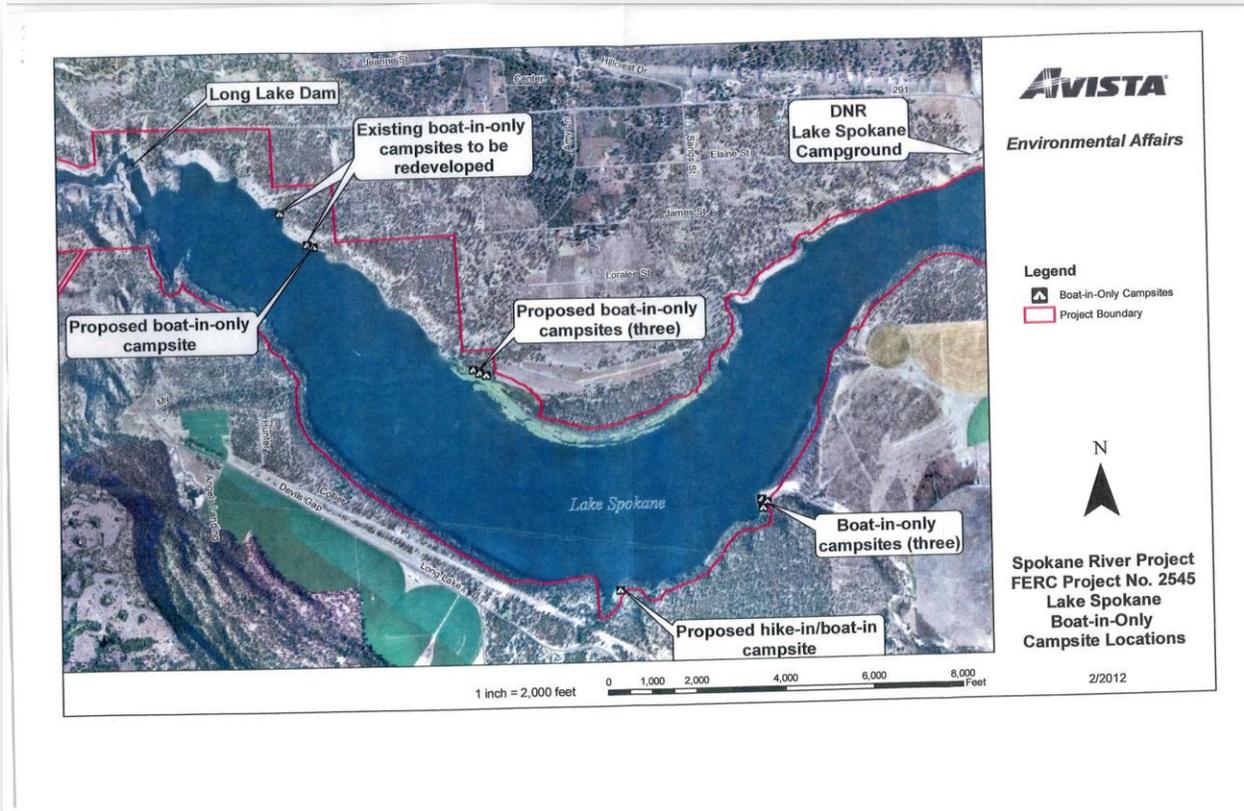
If you have any questions or concerns, feel free to call me at (509) 495-2919.

Sincerely,

Reje' Wiley
Recreation, Land Use and Cultural Resource Specialist

Enclosure

U.S. Fish and Wildlife Comment and Avista Response



Personal communication between Erin Kuttel, U.S. Fish and Wildlife Service, and Rene' Wiley, Avista, on March 23, 2012.

Ms. Kuttel confirmed that U.S. Fish and Wildlife Service received the boat-in-only campsite location information from Avista and that they did not have any comments.