

AVISTA CORPORATION

2015 TO 2019 FIVE-YEAR WETLAND AND RIPARIAN HABITAT PROTECTION AND ENHANCEMENT PLAN

IDAHO 401 WATER QUALITY CERTIFICATION SECTION IV

**Spokane River Hydroelectric Project
FERC Project No. 2545**

**Prepared By:
Avista Corporation**

September 30, 2015

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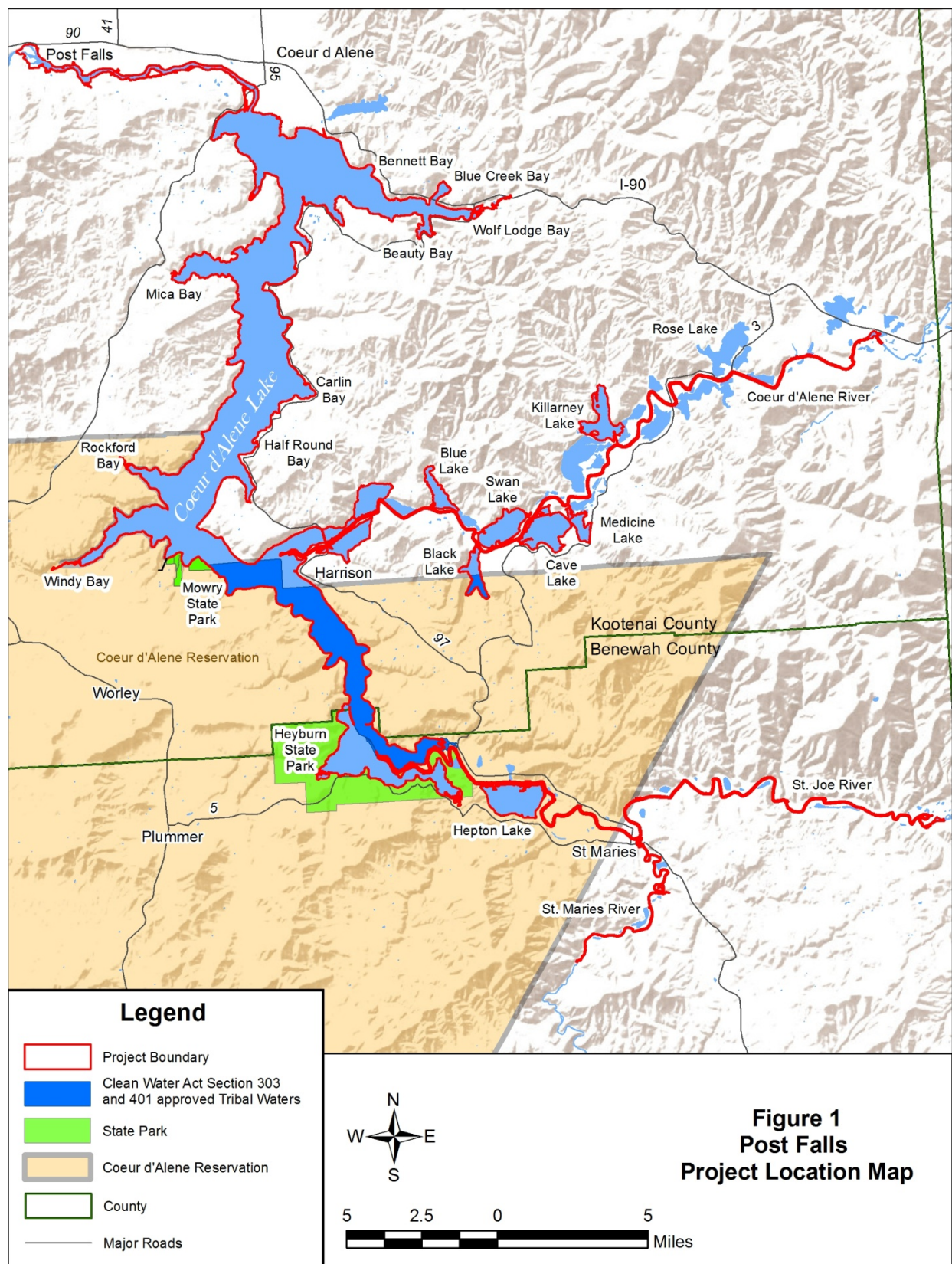
1.0 INTRODUCTION

1.1 Background

On June 18, 2009, the Federal Energy Regulatory Commission (FERC) issued a new license for Avista Corporation's Spokane River Project, FERC Project No. 2545 (Project) for a 50 year license term. The new FERC License (License) became effective on June 1, 2009 and includes operation of the Post Falls Hydroelectric Development (HED) in Idaho (FERC 2009). Ordering Paragraph D of the License incorporated the Idaho Department of Environmental Quality's (IDEQ) Water Quality Certification (Idaho WQC) Conditions under Section 401 of the Federal Clean Water Act (IDEQ 2008). The Conditions can be found in Appendix A of the License. The Idaho WQC states in Section IV that within the first year after the new FERC License becomes effective, Avista shall submit a Wetland and Riparian Habitat Protection and Enhancement Plan (Plan) to IDEQ for approval. Article 401 (a) of the License required Avista to consult with the U.S. Fish and Wildlife Service (USFWS) and Idaho Department of Fish and Game (IDFG) in the preparation of the Plan and that the Plan must be approved by FERC prior to implementation. In 2010 Avista developed the initial Plan, which FERC approved on October 5, 2010. This Plan was updated in 2015 in accordance with the License.

1.2 Post Falls HED

The Post Falls HED includes three dams located on the Spokane River about nine miles downstream from the outlet of Coeur d'Alene Lake (Lake). This outlet which forms a natural channel restriction is the headwaters of the Spokane River. The Post Falls HED Project boundary encompasses the Lake, the Spokane River upstream of the Post Falls Dam, and the lower reaches of the St. Joe, Coeur d'Alene and St. Maries rivers at the normal full pool elevation of 2,128.0 feet (Figure 1). The Post Falls HED controls water levels in the Lake and the lower reaches of tributaries to the lake, except during winter and through most of the spring run-off. Then the outlet channel restriction controls water elevation in the Lake and the flows in the Spokane River.



2.0 FIVE-YEAR PLAN UPDATE

The purpose of this updated Plan is to define the efforts necessary to identify, evaluate, and undertake wetland and riparian protection, restoration, creation and enhancement projects for 2015 through 2019. This Plan satisfies the requirements identified in Article 401 (a) No. 3 and Appendix A, Section IV of the License once approved by FERC. Avista developed and updated this Plan to include the following components as stated in Section IV of the Idaho WQC:

*1. **Wetland and Riparian Habitat Protection and Enhancement Plan.** Avista's Wetland and Riparian Habitat Protection and Enhancement Plan shall include actions to identify, evaluate, and undertake wetland and riparian protection, restoration, creation, and enhancement projects. Preference will be given to sites where perpetual protection is possible; to existing wetlands associated with or in proximity to the Project, with an emphasis on those that cannot be easily replaced through mitigation; and to sites that are "in basin" and "in kind" to the Project-affected wetlands.*

*2. **Five (5) Year Plan.** The Plan shall set forth and describe a prioritized set of measures to be implemented in the first five (5) year period following the effective date of the New License.*

B. Within the first year after the effective date of the New License, Avista shall develop and submit the Plan to IDEQ for approval. IDEQ shall consult with the Idaho Department of Fish and Game ("IDFG") regarding the Plan. Once approved by IDEQ, Avista shall implement the Plan. Every five (5) years beginning with the approval of the first Plan and continuing for the term of the New License, Avista shall update the Plan to describe those measures to be implemented within the next five (5) years. The updated Plan shall be submitted to IDEQ, for approval, and upon approval, shall be implemented by Avista. Avista shall consult with IDEQ and IDFG annually regarding those measures to be carried out within the year. Implementation of the Plan and expenditure of funds for specific projects will be governed by Section VIII.A. of this certification.

C. Avista will prepare and submit to IDEQ a summary report every five (5) years documenting implementation of the measures described in the Plan. The report shall be submitted to IDEQ within six (6) months of the end of each reporting period. The report will summarize the activities conducted under this condition during the preceding five (5) years and the results achieved, the overall results achieved to date

(subsequent to first 5 – year period), and the general nature of the activities that will be implemented during the next 5 – year period.

D. By the first July 1st after the effective date of the New License, and every July 1st thereafter for the term of the New License, Avista shall make available \$75,000 to implement this condition. Any funds not expended within one (1) year shall carry over and can be used in the following year consistent with Section VIII.A. of this certification. Any funds carried over shall be in addition to the annual \$75,000 provided by Avista. The fact that funds have not been expended in one (1) year and are carried over does not diminish Avista’s responsibility for providing \$75,000 annually for the life of the New License. Provided, however, that funds which are carried over and not expended within five (5) years shall no longer be available in accordance with Section VIII.A. of this certification. The funding provided by Avista shall be used to pay for work by Avista, IDEQ, or their contractors for the planning, implementing, or reporting components of this condition. The \$75,000 annual payment shall be adjusted in accordance with Section VIII.B. of this certification.

Avista’s internal administrative costs to implement this measure shall be part of Avista’s internal costs for license implementation and compliance. The funds described in this Section IV.D. shall not be used to support Avista’s internal administrative costs to implement this condition.

2.1 Funding

At the time the 2015 update was completed, Avista had approximately \$158,462 available that has been carried over from previous years, which includes the \$75,000 allocated for 2015. Avista shall continue to make \$75,000 available on an annual basis to implement the Plan. Implementation of this Plan and expenditure of funds for specific projects will be governed by Section VIII.A of the Idaho WQC as follows:

A. Except as otherwise provided in this Section VIII., all funds to be provided by Avista described in this certification will be subject to the cost caps set forth in the certification and will remain in Avista’s control until individual measures or activities required by this certification are implemented. Avista will fund individual measures and activities as they are implemented, in accordance with the plans required by this certification, and in coordination with IDEQ and, when applicable, IDFG. All funds required by this certification to carry out measures or activities include the costs of permitting such

measures and undertaking any necessary studies and monitoring. If funds are made available for measures or activities conducted IDEQ or IDFG, IDEQ or IDFG shall provide an accounting/invoice to Avista quarterly. Within 30 days of receipt, Avista shall reimburse IDEQ or IDFG for the costs set forth in the accounting/invoice, up to the cost caps set forth in this certification. Funds not expended in a given year will remain available during the subsequent five (5) years and will not bear interest or be further escalated pursuant to Section VIII.B. below. Any funds provided by Avista pursuant to this certification or any funds carried over may be used to carry out and fund any measures set forth in Sections II, III, IV and VII of this certification. Funds carried over and not spent within five (5) years will no longer be available to implement the conditions of the certification.

Budget sheets are developed to identify funding obligations, expenditures and carry over dollars. It is the intent of IDEQ, Avista, and IDFG to leverage Avista's commitment whenever possible as opportunities arise. This, however, will not diminish Avista's responsibility in regards to the Plan. Implementation activities will be reviewed for potential additional funds through grants, partnerships or other sources that may include: IDFG accessed Bonneville Power Authority Wetland Mitigation Fund; IDFG accessed Recovery Land Act grant; IDFG acquisition and/or habitat improvement funds; Natural Resource Damage Trustees for superfund remediation; the North American Wetland Conservation Act grants; the Idaho Department of Environmental Quality, farm bill programs administered by the Natural Resource Conservation Service (esp. WRP and WHIP); and USFWS Partners for Wildlife Program funds.

2.2 Reporting and Updating

Avista will prepare and submit a summary report every five years as described in Section IV. 2. C. of the Idaho WQC. The summary report will document implementation of the measures described in the Plan and the overall results achieved during the previous five years. The report shall be submitted to IDEQ within six months following each reporting period. The five-year report will be submitted to FERC following consultation with IDEQ, IDFG and USFWS.

Every five (5) years beginning with FERC approval of the Plan, and continuing for the term of the License, Avista shall update the Plan to describe those measures to be implemented during the next five years. Updated Plans will be developed in consultation with USFWS and IDFG,

then submitted to FERC after approval from IDEQ. Avista will implement the updated Plans upon FERC approval.

3.0 PRIORITIZED PROJECTS AND ACTIONS

3.1 Selection Priorities and Evaluation Criteria

IDEQ, IDFG, and Avista (Parties) have developed selection priorities and evaluation criteria for all projects and/or activities that will be implemented through this Plan. Listed below are the criteria for selecting, prioritizing and evaluating projects and/or actions:

1. Wetland protection and/or enhancements projects within or adjacent to the Post Falls HED Project boundary will receive the highest priority;
2. Projects that will qualify for perpetual protection, enhancement and/or restoration;
3. Projects that are ecologically connected to the Post Falls HED Project boundary;
4. Projects that have a high degree of urgency or the wetland benefit to cost ratio is considered high;
5. Projects that are publically owned and/or public access is secured and where long-term conservation easements can be obtained;
6. Projects that are consistent with existing plans and are currently identified as having significant potential to protect or restore wetland or riparian areas;
7. Projects with multiple partners and/or projects that leverage significant non-Avista funds;
8. Projects that have an adequate management component; and
9. Other programs or actions deemed appropriate and agreed to by the parties.

Prioritization will be based on an understanding of the baseline information, consistency with current management and recovery plans, the known presence of contaminated sediments, and the most urgent need for wetland protection and enhancement (USFWS 2002; 1979; 1981). Further consideration will be given to assuring that adequate funding and oversight to complete any action is available prior to implementation. Fewer but more effective efforts may be preferred to a larger number of activities that may not be sustainable either financially or

logistically. A Wetland and Riparian Project Ranking Criteria (Appendix A) will be used to help objectively evaluate and prioritize projects.

3.2 Prioritized Measures

Potential projects and measures will be identified by the Parties or other entities as appropriate. Potential projects will be evaluated through the consultation process and then prioritized and selected according to the prioritization and evaluation criteria identified above in section 3.1. Summaries of previous work activities and other pertinent information will be used to help determine project effectiveness. Potential wetland or riparian site information may include, but not be limited to, size, location, soil type and drainage, ownership, maps, photographs, and hydrologic characteristics. Other relevant information includes National Wetland Inventory (NWI) data, the known presence of contaminated sediments, participating partners, planning and management objectives and mapping completed by Parametrix (2004). Review by the Parties of project proposals ensures a defined evaluation process to select and prioritize measures to undertake wetland and riparian protection, restoration, creation and enhancement actions through this Plan.

3.3 Anticipated Five-Year Implementation Schedule for 2015 to 2019

Avista, in cooperation with the other Parties, plans to implement projects over the five-year period between 2015 and 2019. These measures may be modified, changed or extended depending on the results achieved, as new information becomes available, or as new opportunity arises.

2015-2016 Shadowy St. Joe Wetland Restoration Project

During 2015 and 2016, Avista and IDFG will continue to implement localized herbicide spot treatments as necessary to reduce or eliminate invasive species. Additionally, re-vegetation plantings will be monitored and survivorship success will be measured. If desired by the parties, additional trees and shrubs can be planted on a year by year basis.

2015-2019 Potential Projects

During 2014 and 2015 Avista worked with IDFG, IDEQ and Ducks Unlimited (DU) to identify potential wetland restoration projects. Potential projects are ranked based upon the criteria listed in Appendix A. A list of potential projects has been completed and is listed below. Avista, IDFG, IDEQ and DU will continue to evaluate these projects, as well as any additional projects identified, on a case by case basis.

St. Joe River Wetlands

Three potential properties adjacent to or in the vicinity of the previously completed Shadowy St. Joe Wetland Restoration Project (2010-2014) have been identified. These properties include a 23 acre parcel; a five acre parcel adjacent to it; and an 84 acre parcel adjacent to the five-acre parcel. These three parcels contain existing wetlands, are located in the flood plain and contain St. Joe River frontage.

Mica Bay Wetland Restoration

IDFG owns approximately 100 acres of Mica Bay. Immediately upstream of the IDFG property, Mica Creek has been ditched, drained, and grazed. This project will evaluate options for securing additional property to combine with the IDFG property and developing a project restoration and management plan for the wetland and riparian complex.

Wolf Lodge Bay Wetland Restoration

The portion of Wolf Lodge Bay located between Interstate 90 and Highway 97 has been ditched, drained, and grazed. This project will evaluate options for securing the property and developing a project restoration and management plan for the wetland and riparian complex.

Lower St. Maries River Floodplain Protection and Restoration

This large wetland complex is associated with the St. Maries River floodplain from the confluence with the St. Joe River extending almost four miles upstream. This project will

evaluate options for securing property for long-term protection and to develop a project restoration and management plan for the wetland and riparian complex.

Coeur d'Alene River Basin

No specific properties have been identified in the Coeur d'Alene River basin. The Coeur d'Alene Restoration Plan, once completed, could include potential restoration projects of future interest.

Yet to be identified Projects

Other projects may be identified or new opportunities for wetland and riparian habitat protection and enhancement may be evaluated.

4.0 ANNUAL WORK PLANS

Projects that are selected will be implemented through Annual Work Plans (AWP). Avista consults with IDEQ and IDFG to develop AWP during the first quarter of the upcoming year to be approved for implementation by April 30 of each year of the five-year Plans.

The AWP provide a detailed set of actions to implement within the specified calendar year. The AWP describe the purpose, goals and objectives to how each project will be accomplished that year. Specific tasks will detail the schedules, budgets, funding sources, and any planning, restoration or management activities to include appropriate performance goals and objectives to both measure and help ensure the success of the effort over an established timeframe. Budget sheets identify all anticipated expenditures, carry over dollars, cost share commitments or other funding sources. The AWP are implemented by Avista after consultation with IDEQ and IDFG, the required funding or partnerships have been established, the necessary permits have been obtained, and any ESA consultation, if required, has been completed. Additions or changes to the AWP may occur depending on new information, new opportunities, or as agreed by IDEQ, IDFG and Avista.

5.0 POTENTIAL PROTECTION AND ENHANCEMENT ACTIVITIES

The following section identifies general categories of activities that may be implemented to protect, enhance or restore wetland and riparian habitat through this Plan. These categories are not all inclusive and may vary, as agreed to by the Parties over time.

5.1 Wetland and Riparian Habitat Protection, Restoration, Creation, and/or Enhancement

This provides for a commitment of resources to be used to protect, restore and/or enhance wetland, riparian, lakeshore and stream habitats. Project selection may occur depending on the urgency of securing property ownership or protection. To be effective, activities should be conducted on lands held in fee title, with permanent conservation easements, or by some other means that assures effective long-term management. Activities may include planting and maintenance of buffer strips, exclusion of livestock, reforestation to provide shading, construction of wetland or riparian areas, or other restoration objectives. Floodplain protection and/or protection or restoration of river deltas and lake bays also helps to preserve important habitat types.

Tributary stream and riverine habitats represent important wetland and riparian habitats that often have been affected by a range of natural and human disturbances including mining, non-native species, roads, timber harvest, agriculture, land use and development. In some instances, protection and restoration of stream and riverine habitat may require protecting adjacent lands through purchase, conservation easements, buffer strip creation or other measures with willing and cooperative land owners and managers. In other cases, specific stream channel or shoreline improvements may be deemed desirable.

This also allows the parties to develop new, or modify existing, education or information programs on conservation biology or approaches necessary for the protection of wetland and riparian habitat. Programs may be developed to inform landowners about the importance of preventing or minimizing land disturbances close to wetland or riparian areas or the careful and prudent use of herbicides and pesticides, livestock watering and access to stream banks.

5.2 Fee Title Acquisition

The preferred means of accomplishing wetland and riparian protection or enhancement is through parcel acquisition and ownership by partner agencies or Avista. This will help secure long-term or perpetual protection and management of land acquired under the Plan.

5.3 Perpetual Easement

Perpetual easements are another important mechanism in wetland and riparian habitat protection. Perpetual easements will be pursued where appropriate to ensure long-term protection and management opportunities. Long-term relationships with landowners will be essential to the project success if easements are acquired.

5.4 Term Agreements

Term agreements may provide a less expensive yet effective means of securing and protecting riparian and wetland areas where perpetual protection is not possible. Terms may be for twenty or fifty years or some other long-term period. Term agreements may be pursued when habitat value is high or the project shows benefit for the term.

5.5 Coeur d'Alene Lake Habitat Protection and Enhancement

Protection, restoration and enhancement of open water, palustrine emergent, palustrine scrub-shrub, palustrine forested, and transitional habitats (ecotones) may be pursued in the Project area. Measures to protect or enhance floodplain and delta area near tributary mouths or other specified locations may also be pursued if they provide Project related benefits.

5.6 Monitoring and Evaluation

Studies may be required to determine if the restoration or protection objectives or management goals can be achieved. Projects will be evaluated for restoration or protection opportunities and to determine appropriate goals, objectives and actions, and could include a baseline wetland functions and values analysis. Monitoring programs will be a part of the overall restoration/protection and management program necessary to ensure the long-term goals are

achieved. This will help ensure that the implemented measures are adequately monitored to determine if the action is producing the intended results, and to provide a basis for adjusting or re-directing resources consistent with management goals and objectives.

5.7 Management and Restoration Plans

Management or restoration plans will be developed for protection, restoration and enhancement projects and will include goals and objectives, restoration and protection activities, monitoring, maintenance, information and education measures or other relevant specific actions.

5.8 Wetland Banking

Wetland banking programs in Idaho consist of securing wetland or riparian areas as credits to offset impacts to wetlands from other areas. In general, the mitigation should occur as close to the impacted area as possible. The banking system may be pursued to combine habitat areas or partnerships to meet management goals or restoration/protection objectives.

6.0 ENDANGERED SPECIES ACT

The USFWS was consulted with on threatened or endangered species and their critical habitats during the re-licensing of the Spokane River Project, including the Post Falls HED. The FERC submitted its initial Biological Assessment to the USFWS on January 31, 2007. The USFWS concurred with FERC that licensing of the Project was "not likely to adversely affect" bald eagles and would have no effect on the water howellia, Ute ladies' tresses, Spalding's catch fly or gray wolf. On July 31, 2008 the USFWS concurred with FERC that issuance of new License for Avista Utilities Spokane River Hydroelectric Project, which includes the Post Falls Hydroelectric Development, is "not likely to adversely affect" bull trout or bull trout critical habitat.

The USFWS July 31, 2008, concurrence with FERC's "not likely to adversely affect" determination under Section 7 of the Endangered Species Act (ESA) for issuance of the Spokane River Hydroelectric Project license which included the requirement that Avista develop a

Wetland and Riparian Habitat Protection & Enhancement Plan. However, to the extent impacts to bull trout or bull trout critical habitat from the Wetland and Riparian Habitat Protection and Enhancement Plan would exceed those anticipated in that consultation; additional site specific ESA consultation may be required.

7.0 REFERENCES

- FERC. 2009. Order Issuing New License and Approving Annual Charges For Use of Reservation Lands. Federal Energy Regulatory Commission. Project Nos. 2545-091 issued June 18, 2009. Washington DC.
- IDEQ. 2008. Idaho Department of Environmental Quality Certification Under Section 401 of the Federal Clean Water Act. Issued June 5, 2008.
- Parametrix. 2004. Spokane River Hydroelectric Project Wetland and Riparian Habitat Mapping and Assessment. Parametrix Inc. Kirkland, WA.
- U.S. Fish and Wildlife Service (USFWS). 2002(b). In bull trout (*Salvelinus confluentus*) draft recovery plan. Chapter 15, Coeur d'Alene Lake Basin Recovery Unit. U.S. Fish and Wildlife Service, Portland, Oregon. 92 pp.
- USFWS. 1979. Classification of Wetlands and Deepwater Habitats of the United States. Prepared for USFWS by Lewis M. Cowardin, Virginia Carter, Francis C. Golet, and Edward T. LaRoe. U.S. Department of the Interior, Fish and Wildlife Service, Office of Biological Services, Washington, D.C., December 1979.
- USFWS. 1981. U.S. Fish and Wildlife Service Mitigation Policy; Notice of Final Policy. Federal Register; Vol. 46, No. 15; January 23, 1981.

APPENDIX A
Wetland and Riparian Project Ranking Criteria

Wetland and Riparian Project Ranking Criteria (18 total points)

Five Year Wetland and Riparian Habitat Protection and Enhancement Plan

Project and Total Points:

Reviewer (IDFG, IDEQ, Avista):

- Area enhancement project will encompass (5 points):
 - Direct association within Post Falls HED Project Boundary (4 pts).
 - Adjacent to or ecologically connected to Post Falls HED Project (3 pts).
 - Project uses native vegetation rather than non-native vegetation (1 pt).
 - Project is adjacent to or hydrologically connected to existing conservation areas (1 pt).
 - Not in Post Falls HED Project basin (project ineligible).
- Project qualifies for long term protection (4 points):
 - Perpetual protection, enhancement and/or restoration (4 pts)
 - Long term protection but not perpetual (3 pts).
 - Sustainability and/or ongoing oversight (2 pt).
- Expected benefits relative to cost (3 points):
 - Project shows urgency of need or identified as significant benefit (3 pts.)
 - Project benefits exceed costs (2 pts).
 - Project benefits about equal to cost (1 pt).
 - Project costs exceed benefits (Project ineligible).
- Project consistency with current management/recovery plans (2 points):
 - Project is consistent with and complements goals and objectives of current management plans, recovery plans (USFWS draft recovery plan for bull trout), or has significant potential to benefit wetlands and/or designated beneficial uses (2 pts).
- Cost sharing or in-kind services (2 points): Percent of the project that will be funded from other (non Avista funding) revenue sources and/or in-kind services.
 - Greater than or equal to 25% of the total project cost (2 pts).

Project will rely entirely on funding from this initiative (1 pt).

- Project has monitoring and management component (2 points):

Project has well defined monitoring and/or management component that will help determine effectiveness (2 pts).

APPENDIX B
Consultation Record

Avista's Letter to Idaho Department of Environmental Quality



August 4, 2015

Mr. Thomas Herron
Idaho Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83814

**Subject: Spokane River Hydroelectric Project, FERC Project No. 2545
2015 To 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan
Plan and 2010 To 2014 Summary Report, as Required by the Spokane River License,
Appendix A, Section IV**

Dear Mr. Herron:

On June 18, 2009 the Federal Energy Regulatory Commission (FERC) issued a new license for the Spokane River Hydroelectric Project, FERC Project No. 2545 (License). Ordering Paragraph D of the License incorporated the Idaho Department of Environmental Quality's (IDEQ) Section 401 Water Quality Certification (Idaho WQC) for the Post Falls Hydroelectric Development. The conditions of the Idaho WQC can be found in Appendix A of the License.

Section IV of the Idaho WQC required Avista to complete the *2010 To 2014 Wetland and Riparian Habitat Protection and Enhancement Plan* (Plan) which was approved by FERC on October 5, 2010. Avista is also required to prepare the *2010 To 2014 Plan Summary Report* (Report) which summarizes the work accomplished under the Plan and to provide copies of it to IDEQ, Idaho Department of Fish and Game (IDFG) and U.S. Fish and Wildlife Service (USFWS). As such, we have enclosed a copy of the Report.

Additionally and in accordance with FERC's Order, Avista is required to submit a new five year Plan to IDEQ, IDFG and FWS for review and comment, and following IDEQ's approval of the new five year Plan, Avista will file it with FERC by October 5, 2015.

Avista has enclosed the *2015 To 2019 Wetland and Riparian Habitat Protection and Enhancement Plan* and Report for your review and comment. Please provide your comments and recommendations on the Plan and Report, if you have any, by **September 4, 2015**. Following consultation, we are required to submit an IDEQ approved plan to FERC for final approval by October 5, 2015.

If you have any questions regarding the Report or Plan, please feel free to call me at (509) 495-2796.

Sincerely,

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

David A. Armes
Terrestrial Resource Specialist

Enclosures (2)

c: Dave Leptich, IDFG
Bryon Holt, USFWS

Idaho Department of Environmental Quality's Comments

From: Jamie.Brunner@deq.idaho.gov
To: [Armes, David](#)
Cc: Thomas.Herron@deq.idaho.gov
Subject: RE: Idaho Wetland Plan and Wetland Plan Summary Report
Date: Thursday, September 03, 2015 2:22:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi David,

I don't have any concerns. I do have a couple of tiny edits, though:

2015-19 plan

- Page 6, bullet 6, I think you mean *restore*, rather than *restoration*, but I may be reading it wrong.
- Page 9, last line under Coeur d'Alene River Basin, should there be an *are* or *may be* in there?

2010-14 summary

- Page 6, there's an extra *r* in canary grass at the end of "2011 tasks" (and I think they are two words)

I know you were looking for substantial comments, but I thought I'd share anyway. Take em or leave em. Otherwise, nice work!

Thanks,

Jamie

From: Thomas Herron
Sent: Thursday, September 03, 2015 8:53 AM
To: Armes, David
Cc: Jamie Brunner
Subject: RE: Idaho Wetland Plan and Wetland Plan Summary Report

David,

I've looked over the Plan and Report and they both look good to me. Jamie has also been looking at them and I haven't heard any concerns from her. I appreciate the breakdown of funding from 2009 through 2014 in each of the compiled reports in the Report. The Plan looks like it provides all the flexibility and latitude that we would need in the future. The projects that we have been talking about seem like they could fit. To that end I see a meeting scheduled at 5:00 to 5:30 on Friday the 4th? Is that still on? Which Pub? I'm happy to get together and talk about it if there is a meeting scheduled after hours on the Friday of a Long Weekend!

Thanks for copying the documents to me.

Thomas Herron
Regional Water Quality Program Manager
Coeur d'Alene Regional Office
Idaho Department of Environmental Quality
208-666-4631

From: Armes, David [<mailto:David.Armes@avistacorp.com>]
Sent: Tuesday, August 04, 2015 2:30 PM

Avista's Response to Idaho Department of Environmental Quality's Comments

Avista has addressed all of IDEQ's comments by making the recommended changes.

Avista's Letter to Idaho Department of Fish and Game



August 4, 2015

Mr. Dave Leptich
Idaho Department of Fish and Game
2885 W. Kathleen Ave.
Coeur d'Alene, ID 83815

**Subject: Spokane River Hydroelectric Project, FERC Project No. 2545
2015 To 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan
Plan and 2010 To 2014 Summary Report, as Required by the Spokane River License,
Appendix A, Section IV**

Dear Mr. Leptich:

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David A. Armes
Terrestrial Resource Specialist

Enclosures (2)

c: Thomas Herron, IDEQ
Bryon Holt, USFWS

Idaho Department of Fish and Game's Comments

From: [Leptich, David](#)
To: [Armes, David](#)
Cc: [Teare, Jim](#)
Subject: RE: Idaho Wetland Plan and Wetland Plan Summary Report
Date: Friday, August 14, 2015 8:54:10 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi David:

Small edits as discussed:

1. Page 5 middle of page as written/punctuated states Idaho Dept Environmental Quality **farm bill programs**, ... I think the comma needs to go before farm bill programs not after. To my knowledge DEQ has no farm bill programs. However ... , farm bill programs administered by the NRCS ... would make sense
2. Page 6 3.1 bullet 6: "protect or restoration wetland ..." Change restoration to restore
3. Page 7 top of page. There is only one appendix so it should be appendix A not E (which is how that appendix is labeled).
4. Page 7 3.2 middle of the paragraph. Should hydraulic be hydrologic? Hydraulic does refer to fluids in motion and is not wrong per se. However, when we discuss habitat and land forms we typically are concerned with hydrology.
5. Page 9 CDA River Basin fix dropped word in second sentence. ... projects of future interest. Or ... projects that are of future interest.

Thanks for the opportunity to review the "AVISTA Corporation 2015 to 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan". It looks good and IDFG has no additional substantive comments beyond our suggested text edits listed above. I look forward to working together in the coming year.

David J. Leptich

Regional Wildlife Habitat Biologist
Idaho Department of Fish and Game
2885 W. Kathleen Ave.
Coeur d'Alene, ID 83815

Office: 208-769-1414
Cell: 208-660-0755
E-mail: david.leptich@idfg.idaho.gov

From: Armes, David [mailto:David.Armes@avistacorp.com]
Sent: Tuesday, August 04, 2015 2:31 PM
To: Leptich, David
Subject: Idaho Wetland Plan and Wetland Plan Summary Report

Dave,

Attached are the *2015 To 2019 Wetland and Riparian Habitat Protection and Enhancement Plan* (Plan) and *2010 To 2014 Wetland and Riparian Habitat Protection and Enhancement Summary Report* (Report) for your review and comment. Please provide your comments and recommendations on the Plan and Report, if you have any, by **September 4, 2015**. Please let me know if you have any questions.

Thanks!

David Armes

Terrestrial Resource Specialist



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Avista's Response to Idaho Department of Fish and Game Comments

Avista has addressed all of IDFG's comments by making the recommended changes.

Avista's Letter to U.S. Fish and Wildlife Service



August 4, 2015

Mr. Bryon Holt
U.S. Fish and Wildlife Service
11103 E. Montgomery Drive
Spokane Valley, WA 99206

**Subject: Spokane River Hydroelectric Project, FERC Project No. 2545
2015 To 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan
Plan and 2010 To 2014 Summary Report, as Required by the Spokane River License,
Appendix A, Section IV**

Dear Mr. Holt:

On June 18, 2009 the Federal Energy Regulatory Commission (FERC) issued a new license for the Spokane River Hydroelectric Project, FERC Project No. 2545 (License). Ordering Paragraph D of the License incorporated the Idaho Department of Environmental Quality's (IDEQ) Section 401 Water Quality Certification (Idaho WQC) for the Post Falls Hydroelectric Development. The conditions of the Idaho WQC can be found in Appendix A of the License.

Section IV of the Idaho WQC required Avista to complete the *2010 To 2014 Wetland and Riparian Habitat Protection and Enhancement Plan* (Plan) which was approved by FERC on October 5, 2010. Avista is also required to prepare the *2010 To 2014 Plan Summary Report* (Report) which summarizes the work accomplished under the Plan and to provide copies of it to IDEQ, Idaho Department of Fish and Game (IDFG) and U.S. Fish and Wildlife Service (USFWS). As such, we have enclosed a copy of the Report.

Additionally and in accordance with FERC's Order, Avista is required to submit a new five year Plan to IDEQ, IDFG and FWS for review and comment, and following IDEQ's approval of the new five year Plan, Avista will file it with FERC by October 5, 2015.

Avista has enclosed the *2015 To 2019 Wetland and Riparian Habitat Protection and Enhancement Plan* and Report for your review and comment. Please provide your comments and recommendations on the Plan and Report, if you have any, by **September 4, 2015**. Following consultation, we are required to submit an IDEQ approved plan to FERC for final approval by October 5, 2015.

If you have any questions regarding the Report or Plan, please feel free to call me at (509) 495-2796.

Sincerely,

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

David A. Armes
Terrestrial Resource Specialist

Enclosures (2)

c: Thomas Herron, IDEQ
Dave Leptich, IDFG

Avista did not receive any comments from the U.S. Fish and Wildlife Service.

Final IDEQ's Approval of the 2015-2019 Plan

Avista's E-mail to Idaho Department of Environmental Quality

From: Armes, David
To: ["Thomas.Herron@deq.idaho.gov"](mailto:Thomas.Herron@deq.idaho.gov); Jamie.Brunner@deq.idaho.gov
Subject: Idaho Wetland Plan for IDEQ Approval
Date: Tuesday, September 22, 2015 2:22:00 PM
Attachments: [2015 Five-Year Wetland Summary 9-15.pdf](#)
[Idaho Wetland Plan 2015 to 2019 Five Year Update 9-2015.pdf](#)

Tom/Jamie

Attached for your approval are the revised 2015 to 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan and the 2010-2014 Summary Report. The Plan and Summary Report incorporate the comments provided by both IDFG and IDEQ. We are requesting your approval prior to September 29, 2015 so the we can file the IDEQ approved plans with FERC prior to October 5, 2015.

Thanks,
David

Idaho Department of Environmental Quality's E-mail to Avista

From: Robert.Steed@deq.idaho.gov
To: Armes, David
Cc: Jamie.Brunner@deq.idaho.gov; Thomas.Herron@deq.idaho.gov
Subject: Idaho Wetland Plan for IDEQ Approval
Date: Friday, September 25, 2015 2:25:45 PM

Idaho Department of Environmental Quality has reviewed the revised 2015 to 2019 Five-Year Wetland and Riparian Habitat Protection and Enhancement Plan and the 2010-2014 Summary Report provided to us via E-mail on September 22, 2015. IDEQ approves both the Plan and the Summary Report. Please file approved Plan and the Summary Report with FERC.

If you have any questions please feel free to contact me at address below.

Robert Steed

Surface Water Ecologist
Idaho Department of Environmental Quality
Coeur d'Alene Regional Office
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