

February 26, 2020

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

**Subject: Spokane River Project License, FERC Project No. 2545, Article 410  
Submittal of Coeur d'Alene Lake Aquatic Weed Management Plan for  
Non-Tribal Waters 2019 Summary Report**

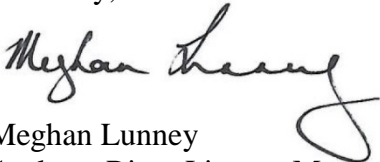
Dear Secretary Bose:

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 Coeur d'Alene Lake Aquatic Weed Management for Non-Tribal Waters Summary Report (Summary Report) to FERC for approval, after consulting with the Idaho Department of Environmental Quality, Idaho State Department of Agriculture, Kootenai County Noxious Weed Control Board, and the Coeur d'Alene Tribe (Tribe). Avista consulted with the above agencies and Tribe, and included copies of the consultation record, including their comments and Avista's responses to them, in Appendix B of the enclosed 2019 Summary Report.

With this, Avista is submitting the 2019 Summary Report to FERC. If you have any questions regarding this filing, please feel free to contact me at (509) 495-4643 or Robert Stephens at (509) 495-8340.

Sincerely,



Meghan Lunney  
Spokane River License Manager

Enclosure (1)

cc: Jamie Brunner, IDEQ  
Kim Holzer, ISDA  
Jake Strange, KCNWCB  
Ben Scofield, Coeur d'Alene Tribe  
Shelby Heiderman, SCDNW  
Robert Stephens, Avista

# **AVISTA CORPORATION**

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## **COEUR D'ALENE LAKE AQUATIC WEED MANAGEMENT PLAN FOR NON-TRIBAL WATERS 2019 SUMMARY REPORT**

**SPOKANE RIVER LICENSE ARTICLE 410**

**SPOKANE RIVER HYDROELECTRIC PROJECT  
FERC PROJECT No. 2545**

Prepared By:  
Avista Corporation

*February 26, 2020*

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- Appendix B. Consultation Record.

## 1.0 INTRODUCTION

The purpose of the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan; Avista 2010) 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), Shoshone County, Department of Noxious Weeds (SCDNW), 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 (FERC 2009). The Project 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 (Avista 2010), 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). It 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 controlling aquatic noxious weeds.

The Plan also identifies the Cooperating Parties (Refer to Section 1.0) 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 within the Post Falls HED Project boundary.

Surveys of portions of the littoral habitat in Coeur d'Alene Lake have been conducted each year since 2006 to identify aquatic noxious weeds within the Project boundary, with areas more susceptible to weed infestation surveyed more frequently. During these surveys, three types of milfoil have been identified which includes native northern watermilfoil (*Myriophyllum sibiricum*), non-native Eurasian watermilfoil (*M. spicatum*) and a hybrid of the two. Until 2018, non-native Eurasian watermilfoil and the hybrid Eurasian watermilfoil are hereafter collectively

referred to as EWM, were the only two aquatic noxious weeds that had been identified in the Project boundary.

In the northern portion of the Coeur d'Alene Lake, infestations of EWM have been identified in Cougar Bay, Wolf Lodge Bay, Mica Bay, Bell Bay, Silver Beach Marina, Windy Bay, 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) (Coeur d'Alene Tribe 2006, 2007, 2008, 2009, 2010; Avista 2011B, 2013, 2018). Avista and the Tribe (2008-2018) have also identified infestations of EWM in the southern portion of Coeur d'Alene Lake and within the Reservation boundary, which is managed under the Coeur d'Alene Reservation Aquatic Weed Management Plan (Coeur d'Alene Tribe and Avista 2017).

In July of 2018, Curly-leaf pondweed (*Potamogeton crispus*; CLP) was found around the 3rd Street Boat Launch and Hagadone Marina in the northwest section of Coeur d'Alene Lake. This was the first time CLP had been found in Coeur d'Alene Lake. During 2018, Avista worked with the Cooperating Parties to identify its distribution and in 2019 coordinated a treatment in June and again in September in an effort to eradicate the population.

## 2.0 COORDINATION

Avista met with the Cooperating Parties on November 30, 2018, March 3, 2019, and July 25, 2019 regarding the following task list:

- Review results of 2018 aquatic weed surveys and treatments in Coeur d'Alene Lake
- Discuss treatment plans for the CLP infestation around the 3<sup>rd</sup> Street Boat Launch and Hagadone Marina
- Partner with IDEQ and ISDA to survey and monitor for EWM
- Coordinate treatments on EWM, including diver suction dredge in Cougar Bay, and herbicide application in Wolf Lodge Bay
- Coordinate EWM management with the Tribe within Tribal waters
- Partner with Kootenai County to provide educational funding for 2019 activities

## 3.0 SURVEYS

In 2011, Avista and IDEQ mapped suitable EWM habitat and identified a survey rotation based on susceptibility to EWM infestation within Coeur d'Alene Lake (Aquatechnex 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 while low priority suitable habitats and shoreline segments are surveyed a minimum of once per five-year period (Figure 2). Past surveys have identified varying amounts of EWM in bays located within the non-tribal waters of Coeur d'Alene Lake. An estimated 600-700 acres of EWM has previously been identified in the chain lakes, including Anderson, Black, Blue, Cave, Killarney, Medicine and Thompson lakes.

In 2019, the Cooperating Parties conducted numerous surveys for invasive aquatic weeds in Coeur d'Alene Lake (Figure 3). EWM and CLP are the primary species of concern present.

CLP at 3<sup>rd</sup> Street Boat Launch and Hagadone Marina. Avista and ISDA conducted a snorkel survey on June 11, 2019, and confirmed that CLP was still present over an area of 8.8 acres (Figure 4). Immediately following the snorkel survey, an aquatic herbicide treatment was conducted on June 12, 2019. A post treatment snorkel survey was conducted on June 17, 2019, and indicated CLP plants were wilting and discolored. An additional snorkel survey, conducted on August 22, 2019, indicated CLP was still present where the densest patch of the infestation was observed in 2018 (Thomas Moorhouse, Clean Lakes Inc., personal communication). This resulted in a second aquatic herbicide treatment being conducted on September 9, 2019. A post-treatment snorkel survey conducted on October 4, 2019, detected a patch of CLP growing in front of the storm drain outfall adjacent to the 3rd Street Boat Launch. Other areas adjacent to the 3rd Street Boat Launch were rapidly surveyed via snorkeling and no CLP was found elsewhere. Elodea, a native submersed aquatic plant, was also observed in patches and appeared to be thriving.

EWM in Wolf Lodge Bay. Avista reassessed the distribution of the two stands of EWM in Wolf Lodge Bay on August 14, 2019. Mature EWM was easily visible at the lake surface (Figure 5). The area occupied by the stands was estimated at 4.3 and 1.1 acres (Avista 2019C). In 2018, the two stands were estimated to be 4.1 and 1.1 acres.

EWM in Cougar Bay. ISDA and several residents living along the Cougar Bay shoreline, conducted ocular surveys from boats and snorkel surveys on August 20, 2019 of a EWM stand detected in 2018. ACE Diving removed 80 pounds (wet weight) of EWM in Cougar Bay during 2018, however due to poor visibility there was difficulty locating the reported plants. The 2019 survey results indicated that the population had slightly expanded in area as well as in density within Cougar Bay (Figure 5).

EWM in Low Priority Survey Areas of Coeur d'Alene Lake. On August 20-21, 2019, IDEQ, ISDA, and Avista conducted an ocular survey from boats for EWM along shoreline segments of Coeur d'Alene Lake up to 30-feet deep that are classified as low-priority survey areas (Figure 2) and are required to be surveyed on a five-year rotation. No rooted EWM was detected in the low-priority survey areas. However, three small segments of floating EWM were found just south of Rockford Point, and in Sun Up Bay and Windy Bay.

EWM in High Priority Survey Areas of Coeur d'Alene Lake. During the summer of 2019, the Collaborating Agencies conducted surveys for EWM in the following high-priority areas (Figure 2) which are required to be surveyed on a three-year rotation.

- Bell Bay – No EWM detected in 2019. In 2018, ACE Diving was contracted and removed 100 pounds (wet weight) of EWM in 2018.
- Silver Beach Marina – No EWM detected in 2019. In 2018, ACE Diving was contracted and removed 150 pounds (wet weight) of EWM in 2018.
- Eleventh Street Marina – No EWM detected in 2019.
- Wolf Lodge Bay – Two known EWM patches are present here. It was treated in 2019.

- Mica Bay – No EWM detected in 2019. A large scale herbicide treatment was conducted here in 2016, and removal with a diver suction dredge occurred in 2017 and 2018. In 2018, only 10 plants were detected and removed.
- Windy Bay – The presence of a large (> 10 acres) EWM population was observed and known previously to exist here. It was not considered for treatment as the collaborating parties’ prioritized treatment of CLP at Third Street Boat Launch and EWM at Wolf Lodge Bay. This absorbed the majority of funds available for aquatic weed control.
- 16 to 1 Bay – No EWM was detected in 2019.

## **4.0 MANAGEMENT / TREATMENTS**

Avista conducted control efforts of invasive aquatic weeds at three sites in Coeur d’Alene Lake in 2019. CLP was the target at one site and EWM was the target at two sites.

CLP at 3<sup>rd</sup> Street Boat Launch and Hagadone Marina. On June 12, 2019, Avista targeted CLP at 3<sup>rd</sup> Street Boat Launch and Hagadone Marina using an aquatic herbicide treatment of Aquathol K, liquid endothall (EPA Registration Number 70506-176) (Avista 2019A; Figure 4). After post-treatment surveys documented a few surviving CLP plants, Avista conducted a second aquatic herbicide treatment on September 10, 2019 (Avista 2019B). A brief post-treatment survey was conducted on October 4, 2019 which detected one patch of CLP. While the herbicide application efforts to date have successfully reduced the area and density of the CLP infestation, it appears additional management of CLP will be needed at this site.

EWM in Cougar Bay. On September 10, 2019, hand pulling and a diver suction dredge was used to remove EWM in Cougar Bay (Figure 6). Several residents with boats that live along the Cougar Bay shoreline volunteered to locate and mark individual EWM plants to improve the efficiency of the removal effort. The EWM was distributed over an area of approximately 100 acres. Some areas had as many as one plant per square meter but most of the area had less than one plant per 10 square meters, which is considered extremely sparse (ACE Diving 2019). The total weight of EWM removed was approximately 340 pounds of wet plants.

EWM in Wolf Lodge Bay. On September 10, 2019, Avista conducted an aquatic herbicide treatment targeting two stands of EWM in Wolf Lodge Bay (Figure 7) using a mixture of Aquathol K and Weedar 64, liquid 2,4-D (EPA Registration Number 71368-1). The area occupied by the stands was estimated at 4.3 and 1.1 acres (Avista 2019C). The post treatment survey on October 9, 2019 observed that EWM was found mostly controlled within in the 4.3 acre stand, but plants were found in several locations around the edges of the plot, and at one location near the plot center where the plants appeared injured, but still viable.

## **5.0 EWM 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 2019. The areas that were treated, the methods used to control aquatic weeds, and the efficacy ratings are per the Coeur d’Alene Reservation Aquatic Weed Management Plan are listed below. Efficacy is rated as either excellent, fair, or poor. Treatments are considered excellent when all to most of the EWM is removed, a fair treatment will have a moderate level of EWM removed, and a poor treatment will have little to no EWM removed.

Bottom Barriers

The Tribe placed bottom barriers on approximately 3,300 square feet of EWM and problematic aquatic weeds in Cottonwood Bay (Camp Larson swim area). The 10 foot x 10 foot barrier panels were placed over dense patches of aquatic weeds and were left in place for approximately 16 weeks. The efficacy for the bottom barrier treatment was excellent.

Herbicide Treatments

Avista and the Tribe conducted no herbicide treatments in 2019. The bulk of treatment acreages have been shifted to mechanical weed harvesting on a trial basis.

Mechanical Weed Harvesting

Avista and the Tribe hired Northwest Aquatic Harvesting Inc. to complete mechanical weed harvesting on approximately 81 acres of EWM infested plant beds in Benewah, Chatcolet, and Round lakes. One harvester was used to remove EWM and approximately 187,340 lbs. (wet weight) of vegetation was removed from the lakes. The efficacy of the harvester treatments was rated from fair to excellent.

**6.0 2019 EDUCATION / OUTREACH**

Avista partnered with the SCDNW by providing \$2,000 for (1) weed identification handbooks, brochures and educational outreach materials with the theme “Stop the Spread of Noxious Weeds” to distribute at the 2019 North Idaho Fair, and (2) a full page, color ad in the June 2019 edition of the Nickels Worth publication.

**7.0 FUNDING**

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

**Table 1. 2019 Aquatic Weed Funding**

ACE Diving - Hand Pulling EWM	\$1,200.00
Clean Lakes Inc. – Herbicide Treatment of CLP in June	\$12,425.00
Clean Lakes Inc. – Herbicide Treatment of CLP in September	\$12,425.00
Clean Lakes Inc. – Herbicide Treatment of EWM in September	\$12,525.00
SCDNW – Education and Outreach	\$2,000.00
<b>TOTAL</b>	<b>\$40,575.00</b>



## **8.0 PLANNED ACTIVITIES FOR 2020**

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. The annual meeting will be held in January 2020 and a final task list will be completed prior to May 1.

- The highest priority action in 2020 will be treating CLP, which was found in the lake for the first time in 2018. The Cooperating Parties anticipate treating the location with herbicide in early spring and re-surveying the location again in fall to determine the need for additional treatment. Systematic pre-treatment and post-treatment surveys will be conducted in 2020.
- The Cooperating Parties will coordinate to ensure the annual EWM surveys planned for 2020 are implemented and will prioritize locations for treatments.
  - At least three bays (Beauty Bay, Blue Creek Bay and Harrison Slough) will be surveyed for EWM in high priority survey areas that are required to be surveyed on a three-year rotation.
  - The Cooperating Parties will work to develop a strategy on how best to treat the EWM infestation in Wolf Lodge Bay.
- Avista will continue public outreach and educational activities in 2020 as they arise.

## **9.0 PROPOSED CHANGES TO THE PLAN**

Avista is not proposing any new changes to the Plan. This recognizes though, that Avista and the Cooperating Parties have combined the habitats that were previously rated as Moderate (survey every 4 years) into the High (survey every 3 years) and Low (survey every 5 years) categories for efficiency. This provided for a more effective manner in which the surveys for aquatic weeds could be implemented around the lake and within the Project boundary. No changes were made to the methods used to survey or to the minimum survey time periods, with the High category still being surveyed a minimum of once per three-year period and the Low category still being surveyed once per five-year period.

## 10.0 REFERENCES

- ACE Diving. 2019 Summary Report of Removal of Eurasian Watermilfoil from Cougar Bay Using a Diver Suction Dredge. Spirit Lake, WA.
- Aquatechnex. 2011. Lake Coeur d'Alene Aquatic Plant Habitat Mapping Project. Bellingham, WA.
- Avista. 2010. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters. Spokane River Hydroelectric Project FERC Project No. 2545-091.
- Avista. 2011A. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2011 Summary Report.
- Avista. 2011B. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2013 Summary Report.
- Avista. 2013. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2013 Summary Report.
- Avista. 2018. Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2018 Summary Report.
- Avista. 2019A. 2019 (June) Aquatic Invasive Species (Curly-leaf Pondweed) Aquatic Pesticide Application Report (APAR). Avista. Lake Coeur d'Alene Lake, ID.
- Avista. 2019B. 2019 (October) Aquatic Invasive Species (Curly-leaf Pondweed) Aquatic Pesticide Application Report. Avista. Lake Coeur d'Alene Lake, ID.
- Avista. 2019C. 2019 (September) Aquatic Invasive Species (Milfoil) Aquatic Pesticide Application Report. Avista. Lake Coeur d'Alene Lake, ID.
- Coeur d'Alene Tribe and Avista. 2017. Coeur d'Alene Reservation Aquatic Weed Management Plan. Spokane River Hydroelectric Project FERC Project No. 2545-091. February.
- Coeur d'Alene Tribe Lake Management Department. 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.

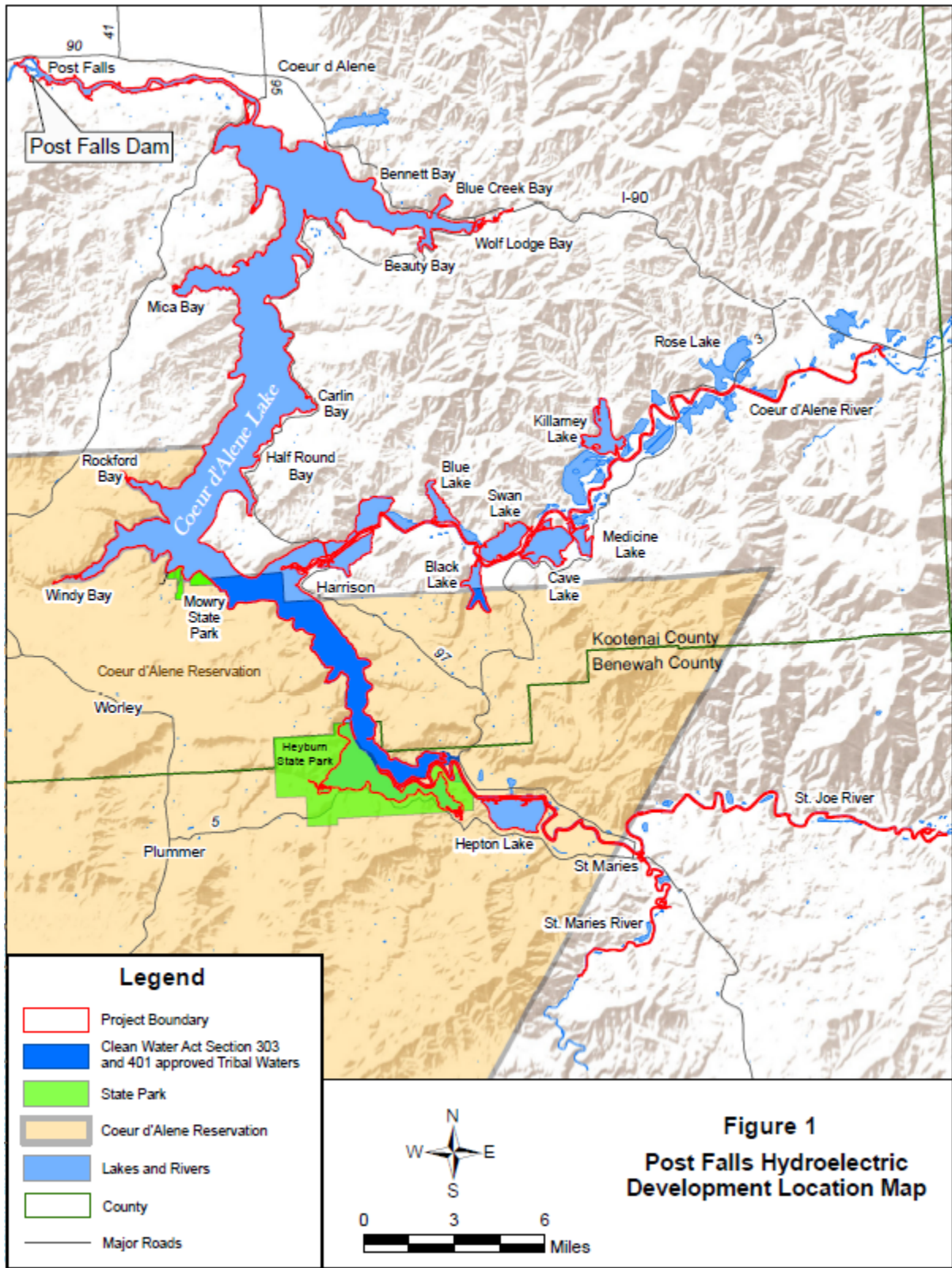
Coeur d'Alene Tribe Lake Management Department. 2009 Coeur d'Alene Tribe Eurasian Watermilfoil Control Program Project Completion Report. Coeur d'Alene Tribe Lake Management Department, Plummer, ID.

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.

Federal Energy Regulatory Commission (FERC). 2009. Project Nos. 2545-091, 12606-000, Order Issuing New License and Approving Annual Charges for Use of Reservation Lands. Issued June 18.

FERC. 2011. Order Modifying and Approving Coeur d'Alene Aquatic Weed Management Plan for Non-Tribal Waters, Pursuant to Article 410. January 19.

## **FIGURES**



**Figure 1**  
**Post Falls Hydroelectric**  
**Development Location Map**

**Figure 1. Post Falls Hydroelectric Development Location Map.**

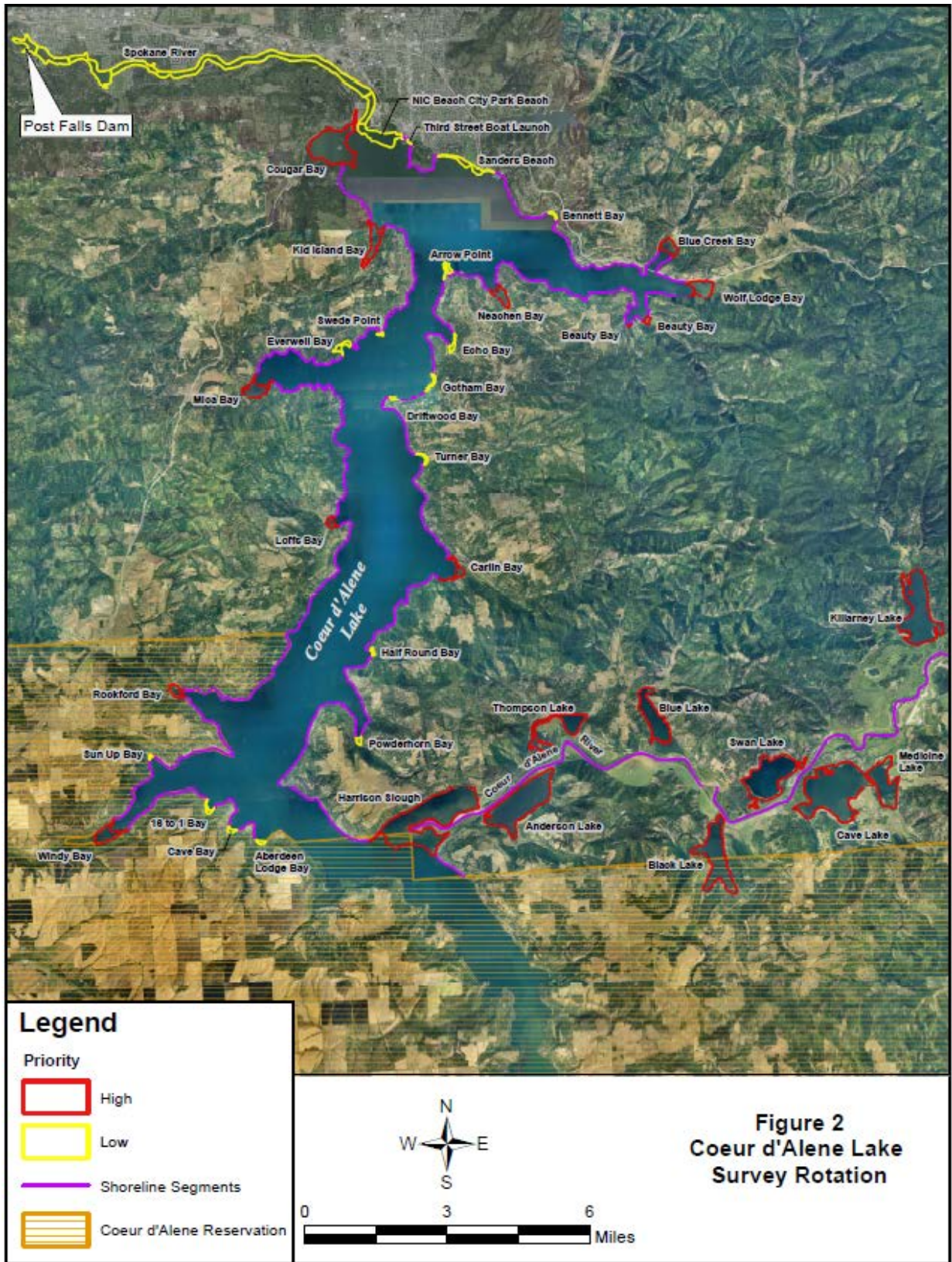


Figure 2. Coeur d'Alene Lake Survey Rotation.

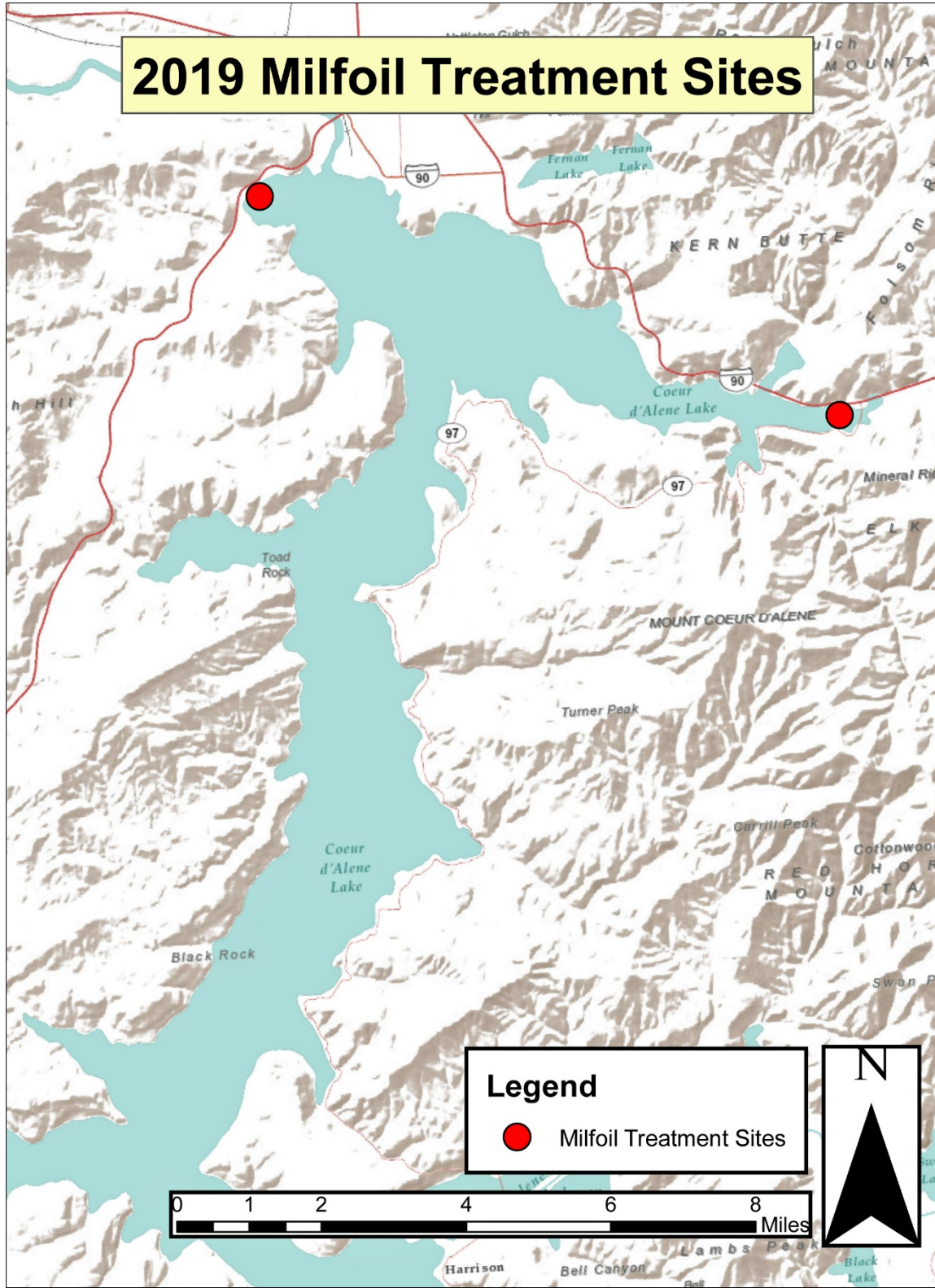


**Figure 3. Bays and Shoreline Segments Surveyed for Milfoil in 2019.**



Figure 4. Area Treated for Curly-leaf Pondweed (*Potamogeton crispus*).

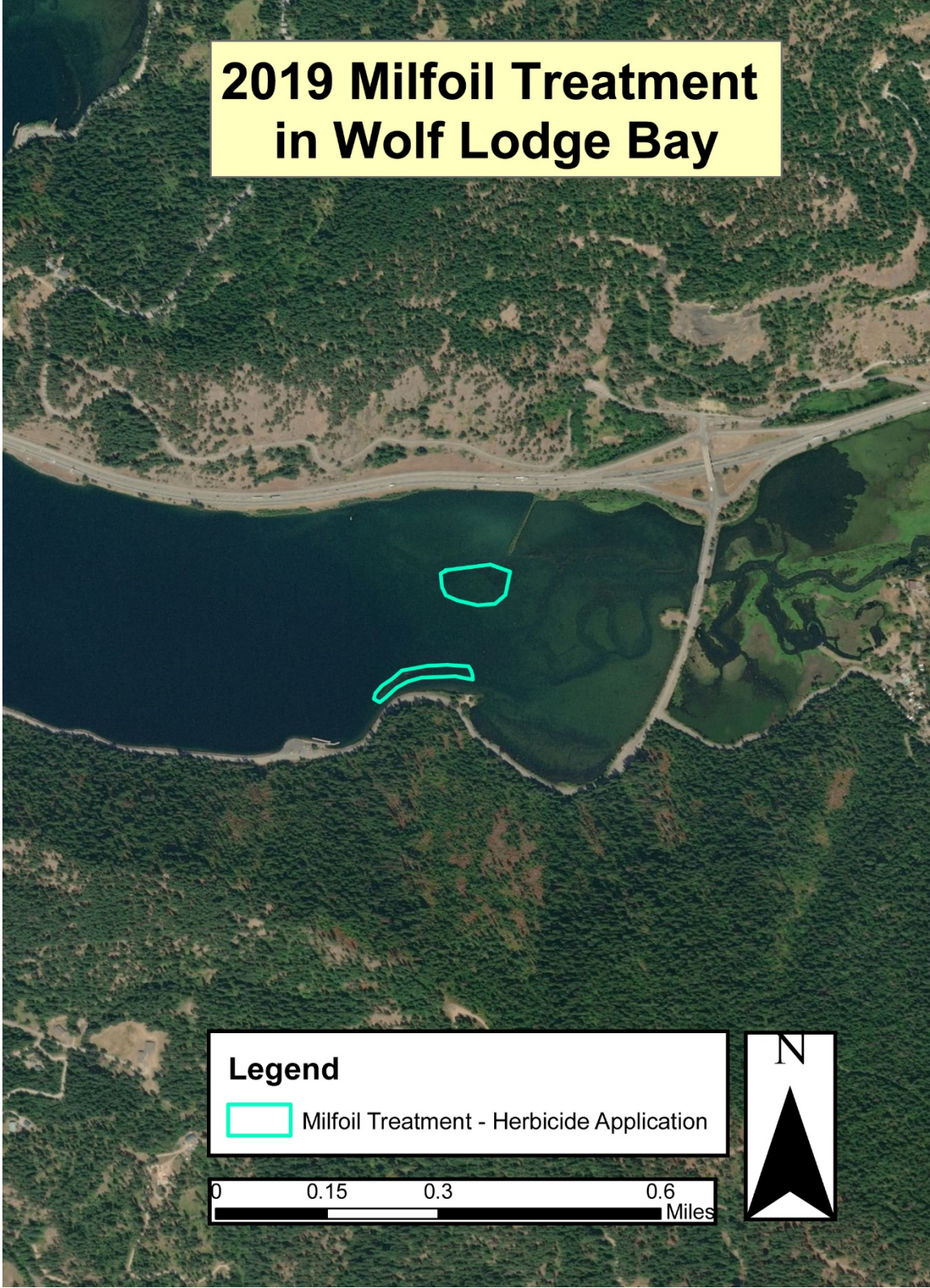




**Figure 5. 2019 Site Locations of Milfoil Treatments in Coeur d'Alene Lake.**



Figure 6. 2019 Cougar Bay Milfoil Treatment Site



**Figure 7. 2019 Wolf Lodge Bay Treatment Site.**

**APPENDIX A**  
**2019 COEUR D'ALENE LAKE AQUATIC WEED MANAGEMENT FOR**  
**NON-TRIBAL WATERS MEETING MINUTES**

## Avista Aquatic Weed Management Coordination

November 30, 2018

Idaho DEQ Coeur d'Alene Regional Office

Attendees: Chris Moan (Avista), Ben Scofield (Coeur d' Alene Tribe), Shelby Heiderman and Jake Strange (Kootenai Co.), Kim Holzer (ISDA), Jamie Brunner and Glen Pettit (IDEQ)

**Curly-leaf pondweed**-Clean Lakes recommends 15 degrees Celsius or above for treatment. Previous consultation with USFWS stipulated no treatment below 18 degrees, but that was based on several years ago when the plan was originally developed. This was when EWM was present primarily in the southern end of the lake near the St. Joe River (bull trout habitat). Chris is discussing consultation for treatment in the northern end with Marshall at USFWS. **Kim will look at the NPDES permit for ISDA herbicide application and see what temperature restrictions are listed.**

Ben said the Coeur d' Alene (CDA) Tribe is collecting temperature data at Camp Larson (Cottonwood Bay). **He will get the data to Chris to aid in projecting when temperatures may reach our target range for treatment.**

**Summer/Fall surveys**-Kim and her crew performed a point intercept survey in Cougar Bay using 70-100 point. That survey itself didn't show presence of Eurasian watermilfoil. However, they observed its presence, illustrating how the point intercept can miss it. She also mentioned they were out surveying the same time the contractor was out hand-pulling. This could be coordinated better in the future in order to identify plants for divers prior to hand pulling.

Discussion on effective EWM control- Doug Freeland (Ace Diving) indicated hand pulling is most effective at densities of 1-2 stems per square meter or less. Ben mentioned herbicide treatment is most effective in areas over 5 acres and distribution in a round shape. Smaller spot treatments require a higher dose.

Chris reported Clean Lakes found 63 acres of EWM at Harrison Slough (not contiguous). They also found about 20 acres in Windy Bay and 5 acres in Wolf Lodge Bay. Ace Diving pulled about 150 pounds of EWM at Silver Beach Marina, 10 tall plants in Mica Bay, 100 pounds in Bell Bay (he indicated it was less than 2017), and 80 pounds in Cougar Bay. He attempted to pull Curly-leaf at the Hagadone Marina, but it was too decomposed. He pulled about 60 pounds of EWM at the Hagadone Marina site.

DEQ and Avista surveyed the hot spots visually, including Bell, 16:1, Sunup, Carlin, Mica, and Wolf Lodge Bays, as well as the Black Rock Marina. Snorkel surveys were performed at Sanders Beach (not all the way to Bennet Bay-just the swimming area) and Fort Sherman/Coeur d'Alene City Beach. No other infestations were identified beyond those already mentioned.

Glen shared IDEQ's spreadsheet created for Avista to assist with tracking the survey schedule, identified infestations, and treatments. **Ben will send the CDA Tribe's records on infestations and treatments over time.**

Kim shared she has a complaint database that is useful to compare to known infestations and treatments. **Glen asked Kim if she could share the information she has from field visits on Coeur d'Alene Lake in order to incorporate it into the IDEQ spreadsheet.** Kim also mentioned that she could request more time for temporary staff in 2019 to assist in surveys on Coeur d'Alene Lake, if the group felt more engagement from ISDA is wanted. The group agreed that 2019 is going to be a heavy work load, and any extra help would be useful and much appreciated.

Proposed for 2018: **Chris will compile the information he has for the 2018 annual report and share with Glen to populate the spreadsheet. Glen will then send it around to others to fill in, and we'll know what may carry over to 2019.**

Future monitoring: IDEQ can handle some survey work in northern Coeur d'Alene Lake areas, this includes visual surveys and point intercept in 4 bays. It may be useful to set aside some days, or even a week, where all partners go out and hammer out the majority of the survey work. Chris indicated Avista should have a person in place to focus on aquatic weed surveys and treatment by then, so setting aside a week shouldn't be a problem. Kim has access to a canoe and cataraft to access areas that are difficult for the IDEQ boat to access. Ben mentioned that a CDA Tribal permit may be required if Idaho or Avista are working in tribal waters.

Discussion followed regarding survey versus treatment. At what point do we stop surveying and start focusing on treatment? Glen highlighted that surveys are required in the plan, on a rotation. Treatment prioritization has been year to year. Kim suggested a decision tree may be helpful to develop. **This would be a good discussion for a focused meeting.** Kim thought it would be good to have temperature data available to be able to identify the treatment window for Curly-leaf pondweed. Glen said DEQ could launch a Hobo temp probe at the 3rd St. Dock to keep an eye on temperature through spring to hit the treatment window.

**Outreach/Education-** Avista had contributed \$2,000 for a noxious weed handbook. Kim passed around a copy and mentioned it should be updated with better pictures. There were also funds directed at supporting the North Idaho Fair booth, run by the Kootenai County Noxious Weed staff. Chris would like a general description of any outreach efforts related to invasive aquatic weeds. Chris inquired if there was more Avista could be doing to contribute to outreach efforts related to invasive aquatic weeds. Glen mentioned the Our Gem maps are a good means of getting info out. Jamie mentioned they are due for reprint, and Laura (Coeur d' Alene Tribe) is spearheading the effort for the reprint.

#### **Future agenda items:**

Survey planning for 2019  
Update on Clean Lakes NPDES permit for Curly-leaf pondweed  
Treatment decision tree  
Equipment needs

**Next Meeting March 7, 2019 at 9 A.M., IDEQ office**

## 2019 ANNUAL MEETING NOTES

### Coeur d'Alene Lake Aquatic Weed Management for Non-Tribal Waters

*Meeting Place: IDEQ Office, Coeur d'Alene, ID  
Meeting Date & Time: 3/7/2019 9:00 AM-12:00 PM*

#### **Attendees:**

Ben Scofield, Coeur d'Alene Tribe  
Glen Pettit, Idaho Department of Environmental Quality  
Tom Herron, Idaho Department of Environmental Quality  
Jaime Brunner, Idaho Department of Environmental Quality  
Kim Holzer, Idaho State Department of Agriculture  
Jeremy Varley, Idaho State Department of Agriculture  
Paul Rhoades, Idaho State Department of Agriculture  
Shelby Heiderman, Shoshone County Public Works  
Chris Moan, Avista

#### **Meeting Notes:**

##### **1. Review the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters**

The attendees discussed that no changes were proposed to the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters in 2018, but the 2018 Summary Report did document the Cooperating Parties' previous alteration of the Coeur d'Alene (CDA) Lake priority habitat ratings, changing from high/medium/low to just high or low.

##### **2. Review 2018 Activities**

Chris Moan provided an update on EWM and curly-leaf pondweed surveys conducted by Avista, ISDA, and IDEQ in 2018. EWM was identified at Silver Beach Marina and in Bell Bay, Harrison Slough, Cougar Bay, Windy Bay, and Wolf Lodge Bay. Curly-leaf pondweed was identified at the 3<sup>rd</sup> Street boat launch and Hagadone Marina.

Chris Moan presented information on the treatments that were conducted in 2018, including hand pulling EWM in Mica Bay, Bell Bay, Cougar Bay, Silver Beach Marina, the 3<sup>rd</sup> Street boat launch and Hagadone Marina. The attendees discussed how the attempt to hand pull curly-leaf pondweed on September 19 was unsuccessful because the plants had already senesced.

Ben Scofield provided an update on surveys and treatments conducted on the Coeur d'Alene Reservation in 2018 including bottom barriers, an herbicide treatment, and mechanical harvesting. The attendees discussed the pros and cons of using a harvester and the potential application of harvesters in other areas in the future.

### **3. Review Current EWM Distribution in Coeur d'Alene Lake**

The attendees reviewed the current distribution of EWM and curly-leaf pondweed in CDA Lake and discussed overall trends in the distribution of EWM.

Jeremey Varley presented to the attendees ISDA's strategy for surveying and treatment actions in 2019. He informed the attendees that Coeur d'Alene Lake and waters within Avista's FERC boundary were classified as a Medium Priority for their staff and ISDA personnel would be available to collaborate on work in the Medium Priority areas only after completing their High Priority work. For example, ISDA may collaborate on pre-treatment surveys of aquatic noxious weeds in Wolf Lodge Bay and Cougar Bay, time permitting. Jeremey showed where the public can find information and stay informed of ISDA's plans and progress at the agency's website at <http://invasivespecies.idaho.gov/>.

### **4. Proposed 2019 Activities**

Chris Moan and Glen Pettit presented the location of surveys that are proposed for 2019. The attendees talked about what methods and protocols could be used for surveying in 2019 and decided that the overall objective of surveying was to identify and document the presence/absence of EWM or curly-leaf pondweed at these locations. The attendees discussed reaching out to other regional agencies, including Idaho Department of Fish and Game and the Bureau of Land Management, to ask for assistance with weed surveys and/or treatments.

Chris Moan then presented Avista's proposed 2019 curly-leaf pondweed and EWM treatment (as recommended by Clean Lakes). The attendees agreed that treating the curly-leaf pondweed was the top priority and agreed that the two phased treatment protocol proposed by Clean Lakes should be implemented.

Windy Bay and Wolf Lodge Bay were identified as priority areas for EWM treatments and the group discussed the need to diversify the chemicals used to treat EWM in the lake, since plants can develop a resistance to specific chemicals if they are used repeatedly at the same location (e.g. 2,4-D). For this reason, the attendees agreed that capturing herbicide active ingredient in our historical workload summary geodatabase would help inform future treatment regimes.

The attendees agreed that any funds remaining after treating for curly-leaf pondweed and EWM in Windy and Wolf Lodge Bay should be used to address treatment needs identified in 2019 surveys.

The attendees discussed conducting an additional survey in late June or early July in Wolf Lodge Bay before treatment is applied to determine the distribution of invasive EWM in the bay.



The attendees discussed appropriating funds to Shoshone County Public Work Department of Noxious Weeds for their aquatic weed education and outreach plans in 2019.

## **6. Potential Future Activities**

The attendees discussed the value of appropriating funds to conduct milfoil genetic analysis on plants found in the lake. The attendees agreed there is value in identifying the milfoil down to species because hybrid watermilfoil may warrant a different treatment approach than Eurasian watermilfoil, but only if the cost was minimal. They agreed to keep genetic testing as a potential focus as funding and need allows.

**Coeur d'Alene Lake Aquatic Invasive Weeds Meeting Agenda**  
*IDEQ Office, Coeur d'Alene, ID*  
*July 25, 2019*

**Attendees:**

Jamie Brunner and Glen Pettit, IDEQ

Kim Holzer, ISDA

Scott Fields and Ben Scofield, Coeur d'Alene Tribe

Meghan Lunney and Rob Stephens, Avista

**1. Roles of collaborating agencies (Avista, ISDA, & IDEQ)**

- Funding - Avista
- Education – ISDA has expertise with outreach and education, including 4 radio ads with the theme of “Knock It Off”. ISDA has also completed numerous educational presentations and workshops on invasive aquatic species.
- Monitoring – IDEQ will assist with some efforts. ISDA can contribute to some monitoring on Coeur d'Alene Lake but leadership is focusing monitoring efforts elsewhere in northern Idaho.
  - Determine survey methodology – done through collaborative discussions between ISDA, IDEQ, & Avista
- Control
  - Prioritization of sites for control – done through collaborative discussions between ISDA, IDEQ, Tribe & Avista. Ben suggested prioritizing (1) CLP at 3<sup>rd</sup> Street Boat Ramp and sites with smaller infestations of invasive aquatic weeds.
  - Determine treatment methodology – done through collaborative discussions between ISDA, IDEQ & Avista. Diver suction dredge appropriate for small populations that are low density. Herbicide is appropriate for invasive aquatic weed populations that occur at higher densities. Bottom barrier are great for small areas such as boat ramp and docks. The Idaho Department of Lands regulates use of bottom barriers.
  - Lake Drawdowns – Avista initiates drawdown following the first Tuesday after Labor Day, with the goal of lowering the lake elevation six to eight feet by the end of December.
- Contracting – mainly through Avista. ISDA likely not able to contract until October 2019.
- Reporting – mainly through Avista. ISDA reporting is available by requesting data from Jeremy Varley
- Additional roles – none discussed.

**2. Treatment of invasive aquatic weeds on Coeur d'Alene Lake in 2019**

- Avista budget for 2019 = \$45,000
  - \$45,000 - \$12,425 (curly-leaf pondweed; spring) - \$12,425 (curly-leaf pondweed; fall) - \$2,000 (Outreach) = \$14,150
- How to prioritize areas for treatment?

- Water body uses, species, and size of infestation
- Sites
  - 2018 survey by Clean Lakes & estimate for treating Eurasian Watermilfoil

Area	Management Priority	Sites	Acres	Cost (2,4-D only)	Cost (Aquathol K)
Harrison Slough	Low	1	63	\$31,814	\$64,538
Windy Bay	Medium	3	19.6	\$9,277	\$17,675
Wolf Bay Lodge	High	2	5.4	\$3,589	\$7,348

- Eurasian watermilfoil in Cougar Bay - 28 plants found at two sites in 2018 (K. Holzer); limited success with follow up treatment (D. Freeland)

### 3. Five-year Eurasian watermilfoil survey of Coeur d’Alene Lake

- All bays have been surveyed by IDEQ. IDEQ will help Avista survey remaining shorelines.
- Methodology:
  - Ben/Coeur d’Alene Tribe does point intercept surveys doing one rake pull per 50 m<sup>2</sup> and data is recorded at each point as “present” or “absent”. They are time consuming – takes 1.5 weeks to survey 100 acres.
  - Kim/ISDA used a changing grid size (10 – 30 meters) based on detection of Eurasian watermilfoil and doing a rake toss. A 250 m<sup>2</sup> grid could be sufficient in suitable habitat for baseline monitoring. Low detection probability in low density populations. Rake toss likely causes fragmentation of the plants. Kim indicated ocular surveys can be better if conditions are good but if conditions are not ideal, detectability of Eurasian watermilfoil will be compromised. Ocular surveys should be done when there is no wind/chop and in good light.
  - Aquatechnex flight citation from 2011 states that Eurasian watermilfoil aerial surveys are best done in late-August/early Sept.
  - ISDA/ Jeremy Varley has a drone. He is developing protocols for ISDA when mapping aquatic weeds. Coeur d’Alene Tribe has drones as well.
  - Sampling methodology for Eurasian watermilfoil (Madsen and Wersel, 2017)
- Time commitment and survey timeframe

### 4. Curly-leaf pondweed update

- 6/12/19 - 8.8 acres treated with Aquathol K at 3<sup>rd</sup> Street Boat Ramp and Hagadone Marina.
- Fall 2019 - Follow up survey will be conducted.

### 5. Outreach Fund

- a. Kootenai Co. contact is Jake Strange.

- b. Shoshone Co. contact is Shelby Heiderman [sheiderman@co.shoshone.id.us](mailto:sheiderman@co.shoshone.id.us)
- c. Education/outreach materials will be provided at county fair and an education/outreach ad will be published in the Nickels Worth publication

**APPENDIX B**  
**CONSULTATION RECORD**

## Avista's December 31, 2019 Letter to Coeur d'Alene Tribe



1411 East Mission Avenue  
PO Box 3727  
Spokane, WA 99220-3727

December 31, 2019

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 Coeur d'Alene Lake Aquatic Weed Management Plan for  
Non-Tribal Waters 2019 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. The Plan requires Avista to submit an annual report that summarizes the activities that were implemented during 2019 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters.

With this, Avista is submitting the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report (Report) for your review. We would like to receive any comments or recommendations that you may have prior to February 1, 2020, which will allow us time to file the Report with FERC by March 1, 2020.

If you have any questions regarding the 2019 Summary Report, please feel free to contact me at (509) 495-8340.

Sincerely,

A handwritten signature in blue ink that reads "Robert Stephens".

Robert Stephens  
Restoration Biologist

Enclosure

cc: Jake Strange, Kootenai County Noxious Weed Control Board  
Kim Holzer, Idaho State Department of Agriculture  
Jamie Brunner, Idaho Department of Environmental Quality  
Shelby Heiderman, Shoshone County, Department of Noxious Weeds  
Meghan Lunney, Avista

# The Coeur d'Alene Tribe's Comments

## Stephens, Rob

---

**From:** Ben Scofield <bscofield@cdatribe-nsn.gov>  
**Sent:** Thursday, January 2, 2020 1:07 PM  
**To:** Lunney, Meghan; Stephens, Rob  
**Subject:** [External] RE: 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report  
**Attachments:** BlackLk\_lit\_surv\_2019.pdf; 2019 Report\_CdA Lake Aquatic Weeds Mgt Plan for Non-Tribal Waters\_12-30-19\_BDScoms.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Meghan and Rob,  
I've reviewed the summary report and have included my suggested edits in the attached pdf. I've also included a map showing the Tribe's Black Lake aquatic veg survey. The map shows milfoil presence/absence from rake grabs and our survey track. We do this every summer so feel free to add a note about this in the surveys section of the report. You don't have to include the map in your summary report. I just wanted to make sure it was clear we are in Black Lake every summer. Thanks for the opportunity to comment and Happy New Year!

[Ben Scofield](#)

---

**From:** Lunney, Meghan <Meghan.Lunney@avistacorp.com>  
**Sent:** Monday, December 30, 2019 14:09  
**To:** Ben Scofield <bscofield@cdatribe-nsn.gov>  
**Cc:** Jamie Brunner (jamie.brunner@deq.idaho.gov) <jamie.brunner@deq.idaho.gov>; Kim.Holzer@ISDA.IDAHO.GOV; jstrange@kcgov.us; sheiderman@co.shoshone.id.us; Stephens, Rob <Rob.Stephens@avistacorp.com>  
**Subject:** 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report

### WARNING !

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- CDA Tribe IT Department

Ben,

On behalf of Rob Stephens, Avista's Restoration Biologist, I've attached for your review the 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and associated cover letter. Please provide any comments you may have prior to February 1, 2020, as we are required to file this report with the Federal Energy Regulatory Commission prior to March 1, 2020.

If you would prefer a paper copy of the attached Report, just let me know and we are happy to send one along. Also, if you have any questions regarding the Report please feel free to call me at 509-495-4643, or Rob Stephens at 509-495-8340.

Thanks,  
-Meghan.

**Meghan Lunney**, Spokane River License Manager  
1411 E Mission Ave MSC-1, Spokane, WA, 99202  
P 509.495.4643 | C 509.842.6133  
[www.myavista.com](http://www.myavista.com)

## **Coeur d'Alene Tribe (CDAT) Comments and Avista's Responses**

### **CDAT Comment #1**

Section 3.0, paragraph #2: "I noticed that Black Lake isn't highlighted here. We do a rake/visual survey at Black Lake every summer and you're welcome to include that on the map. You could categorize it as a shoreline survey I suppose. I'll send a map separately."

### **Avista Response**

The summary report has been revised. Black Lake is now highlighted in Figure 3 showing that a survey occurred in 2019.

### **CDAT Comment #2**

Section 4.0, paragraph #2: Can you specify the herbicide brand? I ask because formulations can be a little different between products. Also, endothall has two l's rather than one. Thanks.

### **Avista Response**

The summary report has been revised to specify the brand name as suggested.

### **CDAT Comment #3**

Section 4.0, paragraph #4: Again, can you specify the brand name?

### **Avista Response**

The summary report has been revised to specify the brand name as suggested.

### **CDAT Comment #4**

Section 6.0 Title: Should this be 2019?

### **Avista Response**

The summary report has been revised as suggested.

### **CDAT Comment #5**

Section 7.0 Table 1: Should this be 2019?

### **Avista Response**

The summary report has been revised as suggested.

### **CDAT Comment #6**

Appendix A, page A-6: Should this be "O" for outreach? I'm not sure what "I" indicates.

### **Avista Response**

The summary report has been revised. I & E was changed to "outreach and education".



## Avista's December 31, 2019 Letter to Idaho Department of Environmental Quality



1411 East Mission Avenue  
PO Box 3727  
Spokane, WA 99220-3727

December 31, 2019

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 Coeur d'Alene Lake Aquatic Weed Management Plan for  
Non-Tribal Waters 2018 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. The Plan requires Avista to submit an annual report that summarizes the activities that were implemented during 2018 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters.

With this, Avista is submitting the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report (Report) for your review. We would like to receive any comments or recommendations that you may have prior to February 1, 2020, which will allow us time to file the Report with FERC by March 1, 2020.

If you have any questions regarding the 2019 Summary Report, please feel free to contact me at (509) 495-8340.

Sincerely,

A handwritten signature in blue ink that reads "Robert Stephens". The signature is fluid and cursive.

Robert Stephens  
Restoration Biologist

Enclosure

cc: Jake Strange, Kootenai County Noxious Weed Control Board  
Kim Holzer, Idaho State Department of Agriculture  
Ben Scofield, Coeur d'Alene Tribe  
Shelby Heiderman, Shoshone County, Department of Noxious Weeds  
Meghan Lunney, Avista

## Idaho Department of Environmental Quality's Comments

**From:** [Jamie.Brunner@deg.idaho.gov](mailto:Jamie.Brunner@deg.idaho.gov)  
**To:** [Stephens, Rob](#)  
**Subject:** [External] FW: 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report  
**Date:** Friday, January 31, 2020 2:21:57 PM  
**Attachments:** [image001.png](#)  
[image001.png](#)  
[ATT00001.htm](#)  
[Avista\\_Cover Ltrr\\_CDA NonTribal 2019 AWSR\\_IDEQ.pdf](#)  
[ATT00002.htm](#)  
[2019 Report\\_CdA Lake Aquatic Weeds Mgt Plan for Non-Tribal Waters\\_12-30-19.pdf](#)  
[ATT00003.htm](#)

---

Hi Rob,

Comments on the 2019 d'Alene Lake Aquatic Weed Management plan for Non-Tribal Waters Summary Report from IDEQ staff are included below.

Please omit from the report • Windy Bay – The presence of large (> 10 acres) milfoil population was observed and known previously to exist here. It is too large to consider for eradication. (Milfoil in High Priority Survey Areas of Coeur d'Alene Lake. Sixth bullet, page 4). The size of infestation is not the cause for non-treatment. Sixteen acres was treated in Windy Bay (2015) and 26 acres was treated in Mica Bay (2016). The reason Wind Bay was not treated in 2019 was due to lack of funds. Curly leaf Pondweed at Third Street boat ramp/Cd'A Resort Marina and Wolf Lodge Bay Eurasian Water Milfoil took priority and most of the budget.

Let me know if you would like to discuss.

Regards,

Jamie



**Jamie Brunner | Coeur d'Alene Lake Management Coordinator**

Idaho Department of Environmental Quality

2110 Ironwood Parkway

Office: (208) 666-4623

<http://www.deg.idaho.gov/>

*Our mission is to protect human health and the quality of Idaho's air, land, and water.*

Begin forwarded message:

**From:** "Lunney, Meghan" <[Meghan.Lunney@avistacorp.com](mailto:Meghan.Lunney@avistacorp.com)>  
**To:** "Jamie Brunner" <[Jamie.Brunner@deg.idaho.gov](mailto:Jamie.Brunner@deg.idaho.gov)>  
**Cc:** "Ben Scofield ([bscofield@cdatribe-nsn.gov](mailto:bscofield@cdatribe-nsn.gov))" <[bscofield@cdatribe-nsn.gov](mailto:bscofield@cdatribe-nsn.gov)>, "[Kim.Holzer@ISDA.IDAHO.GOV](mailto:Kim.Holzer@ISDA.IDAHO.GOV)" <[Kim.Holzer@ISDA.IDAHO.GOV](mailto:Kim.Holzer@ISDA.IDAHO.GOV)>, "[jstrange@kcgov.us](mailto:jstrange@kcgov.us)" <[jstrange@kcgov.us](mailto:jstrange@kcgov.us)>, "[sheiderman@co.shoshone.id.us](mailto:sheiderman@co.shoshone.id.us)" <[sheiderman@co.shoshone.id.us](mailto:sheiderman@co.shoshone.id.us)>, "Stephens, Rob" <[Rob.Stephens@avistacorp.com](mailto:Rob.Stephens@avistacorp.com)>  
**Subject:** 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal

## **Waters Summary Report**

Jamie,

On behalf of Rob Stephens, Avista's Restoration Biologist, I've attached for your review the 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and associated cover letter. Please provide any comments you may have prior to February 1, 2020, as we are required to file this report with the Federal Energy Regulatory Commission prior to March 1, 2020.

If you would prefer a paper copy of the attached Report, just let me know and we are happy to send one along. Also, if you have any questions regarding the Report please feel free to call me at 509-495-4643, or Rob Stephens at 509-495-8340.

Thanks,  
-Meghan.

**Meghan Lunney**, Spokane River License Manager

1411 E Mission Ave MSC-1, Spokane, WA, 99202

P 509.495.4643 | C 509.842.6133

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## **Idaho Department of Environmental Quality (IDEQ) Comments and Avista's Responses**

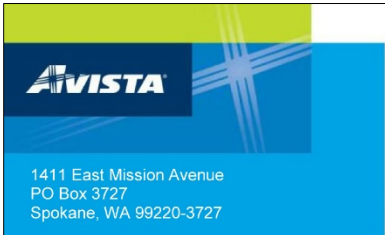
### **IDEQ Comment #1**

Please omit from the report • Windy Bay – The presence of large (> 10 acres) milfoil population was observed and known previously to exist here. It is too large to consider for eradication. (Milfoil in High Priority Survey Areas of Coeur d'Alene Lake. Sixth bullet, page 4). The size of infestation is not the cause for non-treatment. Sixteen acres was treated in Windy Bay (2015) and 26 acres was treated in Mica Bay (2016). The reason Wind Bay was not treated in 2019 was due to lack of funds. Curly leaf Pondweed at Third Street boat ramp/Cd'A Resort Marina and Wolf Lodge Bay Eurasian Water Milfoil took priority and most of the budget.

### **Avista Response**

The following statement was removed from the summary report, "It is too large to consider for eradication" and replaced with, "It was not considered for treatment as the collaborating parties' prioritized treatment of CLP at Third Street Boat Launch and EWM at Wolf Lodge Bay. This absorbed the majority of funds available for aquatic weed control."

# Avista's December 31, 2019 Letter to Idaho State Department of Agriculture



December 31, 2019

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 Coeur d'Alene Lake Aquatic Weed Management Plan for  
Non-Tribal Waters 2018 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. The Plan requires Avista to submit an annual report that summarizes the activities that were implemented during 2019 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters.

With this, Avista is submitting the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report (Report) for your review. We would like to receive any comments or recommendations that you may have prior to February 1, 2020, which will allow us time to file the Report with FERC by March 1, 2020.

If you have any questions regarding the 2019 Summary Report, please feel free to contact me at (509) 495-8340.

Sincerely,

A handwritten signature in blue ink that reads "Robert Stephens".

Robert Stephens  
Restoration Biologist

Enclosure

cc: Jamie Brunner, Idaho Department of Environmental Quality  
Jake Strange, Kootenai County Noxious Weed Control Board  
Ben Scofield, Coeur d'Alene Tribe  
Shelby Heiderman, Shoshone County, Department of Noxious Weeds  
Meghan Lunney, Avista

## Idaho State Department of Agriculture's Comments

**Stephens, Rob**

---

**From:** Kim Holzer <Kim.Holzer@ISDA.IDAHO.GOV>  
**Sent:** Tuesday, January 14, 2020 11:21 AM  
**To:** Stephens, Rob; Paul Rhoades  
**Cc:** Lunney, Meghan; Ben Scofield; jstrange@kcgov.us; sheiderman@co.shoshone.id.us; Jamie.Brunner@deq.idaho.gov  
**Subject:** [External] RE: 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report | ISDA Feedback

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Rob et al.,

Paul and I both read through the Report and have very minor feedback for your consideration:

Page 1: How were the three species of milfoil identified/verified? Genetically or morphologically?

Page 1: Consider referring to Eurasian and hybrid Eurasian watermilfoils collectively as "invasive milfoil" or since you shorthand curly leaf pondweed to CLP, you could refer to invasive milfoil as EWM.

Page 2: Other Idaho State listed aquatic noxious weeds in the project boundary include Curly leaf pondweed. Phragmites, purple loosestrife and yellow flag iris also occur here... depends on whether you consider them true aquatics or marginal (wetland) noxious weeds. What authority do you use for aquatic noxious weeds designation (i.e. State, Federal, Tribe, other)? <http://invasivespecies.idaho.gov/aquatic-plants>

Page 2, Paragraph 1: Infestations of invasive milfoil also currently occur in Cougar Bay, Wolf Lodge Bay... and other bays historically (e.g. Mica Bay), which is omitted here but mentioned later in the document (i.e. Page 3, Paragraph 5).

Page 4, Milfoil in Cougar Bay: Plant density is typically described per square meter.

Page 5: EWM shows up for the first time. Nice summary table!

Page 6: I would like to see us explore hand-pulling or suction dredge for the next CLP treatment(s). Future of Cougar Bay, Windy Bay invasive milfoil?

Page 7: Duplicate 2006 for Tribe's report citation.

Page 8: Only one reference has page numbers listed... consider consistency.

Page 13, Figure 2: Nice effort and collaboration to achieve target survey coverage.

We hope these notes are helpful.

Best Regards,  
Kim

**Kim Holzer, Ph.D.**

Agriculture Program Specialist — North Idaho  
Invasive Species and Noxious Weeds  
Idaho State Department of Agriculture  
600 North Thornton Street  
Post Falls, ID 83854  
Email: [Kim.Holzer@isda.idaho.gov](mailto:Kim.Holzer@isda.idaho.gov)  
Mobile: (208) 580-4254 or (434) 249-5824  
<http://invasivespecies.idaho.gov/invasivespecies-overview/>

---

**From:** Lunney, Meghan <Meghan.Lunney@avistacorp.com>  
**Sent:** Monday, December 30, 2019 2:10 PM  
**To:** Kim Holzer <Kim.Holzer@ISDA.IDAHO.GOV>  
**Cc: Subject:** {External}2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report

Kim,

On behalf of Rob Stephens, Avista's Restoration Biologist, I've attached for your review the 2019 Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters Summary Report and associated cover letter. Please provide any comments you may have prior to February 1, 2020, as we are required to file this report with the Federal Energy Regulatory Commission prior to March 1, 2020.

If you would prefer a paper copy of the attached Report, just let me know and we are happy to send one along. Also, if you have any questions regarding the Report please feel free to call me at 509-495-4643, or Rob Stephens at 509-495-8340.

Thanks,  
-Meghan.

**Meghan Lunney**, Spokane River License Manager

1411 E Mission Ave MSC-1, Spokane, WA, 99202

P 509.495.4643 | C 509.842.6133

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## **Idaho State Department of Agriculture (ISDA) Comments and Avista's Responses**

### **ISDA Comment #1**

Page 1: How were the three species of milfoil identified/verified? Genetically or morphologically?

### **Avista Response**

The Coeur d'Alene Tribe conducted a genetic study in 2016 that identified the three species in the southern portion of Coeur d'Alene Lake.

### **ISDA Comment #2**

Page 1: Consider referring to Eurasian and hybrid Eurasian watermilfoils collectively as "invasive milfoil" or since you shorthand curly leaf pondweed to CLP, you could refer to invasive milfoil as EWM.

### **Avista Response**

The summary report has been revised replacing "Milfoil" with "EWM" throughout the document, per your recommendation.

### **ISDA Comment #3**

Page 2: Other Idaho State listed aquatic noxious weeds in the project boundary include Curly leaf pondweed. Phragmites, purple loosestrife and yellow flag iris also occur here... depends on whether you consider them true aquatics or marginal (wetland) noxious weeds. What authority do you use for aquatic noxious weeds designation (i.e. State, Federal, Tribe, other)?

### **Avista Response:**

To clarify, the summary report indicates that up until 2018, only Eurasian and hybrid Eurasian watermilfoils were known to be present within the project boundary and it also states that Curly-leaf pondweed was identified in 2018.

The Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Plan) only considers true aquatic noxious weeds, not marginal wetland plants. The sources used to assess the presence of aquatic noxious weeds within the project area are from a variety of surveys completed by the Coeur d'Alene Tribe (CDAT 2006, 2008, 2009) and the Inland Empire Cooperative Weed Management Area (IECWMA 2007).

### ***Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters (Avista 2010)***

#### **Section 1.5.1 Surveys**

Eurasian watermilfoil and a hybrid of Eurasian watermilfoil and northern watermilfoil (*Myriophyllum sibiricum*) are the only aquatic noxious weeds noted in the Coeur d'Alene Lake Basin. Infestations of these species have been found in Harrison Slough, along the shoreline near Harrison, within the navigable waters of Heyburn State Park, and within three chain lakes associated with the Coeur d'Alene River (Cave, Medicine, and Black lakes; CDAT 2006, 2008, 2009; IECWMA 2007). In addition, the Tribe (2008) reports infestations of watermilfoil within the St. Joe and St. Maries rivers upstream of the Coeur d'Alene Reservation boundary.



## **Idaho State Department of Agriculture (ISDA) Comments and Avista's Responses**

### **ISDA Comment #4**

Page 2, Paragraph 1: Infestations of invasive milfoil also currently occur in Cougar Bay, Wolf Lodge Bay... and other bays historically (e.g. Mica Bay), which is omitted here but mentioned later in the document (i.e. Page 3, Paragraph 5).

### **Avista Response:**

The summary report has been modified to incorporate the suggested revision.

### **ISDA Comment #5**

Page 4, Milfoil in Cougar Bay: Plant density is typically described per square meter.

### **Avista Response:**

The summary report has been modified to incorporate the suggested revision.

### **ISDA Comment #6**

Page 5: EWM shows up for the first time. Nice summary table!

### **Avista Response:**

Avista appreciates your comment.

### **ISDA Comment #7**

Page 6: I would like to see us explore hand-pulling or suction dredge for the next CLP treatment(s). Future of Cougar Bay, Windy Bay invasive milfoil?

### **Avista Response:**

During our January 27, 2020 Idaho Aquatic Weed Management meeting, all the collaborating parties agreed to use hand-pulling of curly-leaf pondweed at Third Street Marina in 2020 instead of herbicide application. Treatment of curly-leaf pondweed is the collaborating parties' highest priority. Additional treatments targeting milfoil will be dependent upon its presence and distribution based upon 2020 survey results and further discussions with the collaborating parties.

### **ISDA Comment #8**

Page 7: Duplicate 2006 for Tribe's report citation.

### **Avista Response:**

The summary report has been modified to incorporate the suggested revision.

### **ISDA Comment #9**

Page 8: Only one reference has page numbers listed... consider consistency.

### **Avista Response:**

The summary report has been modified to incorporate the suggested revision.

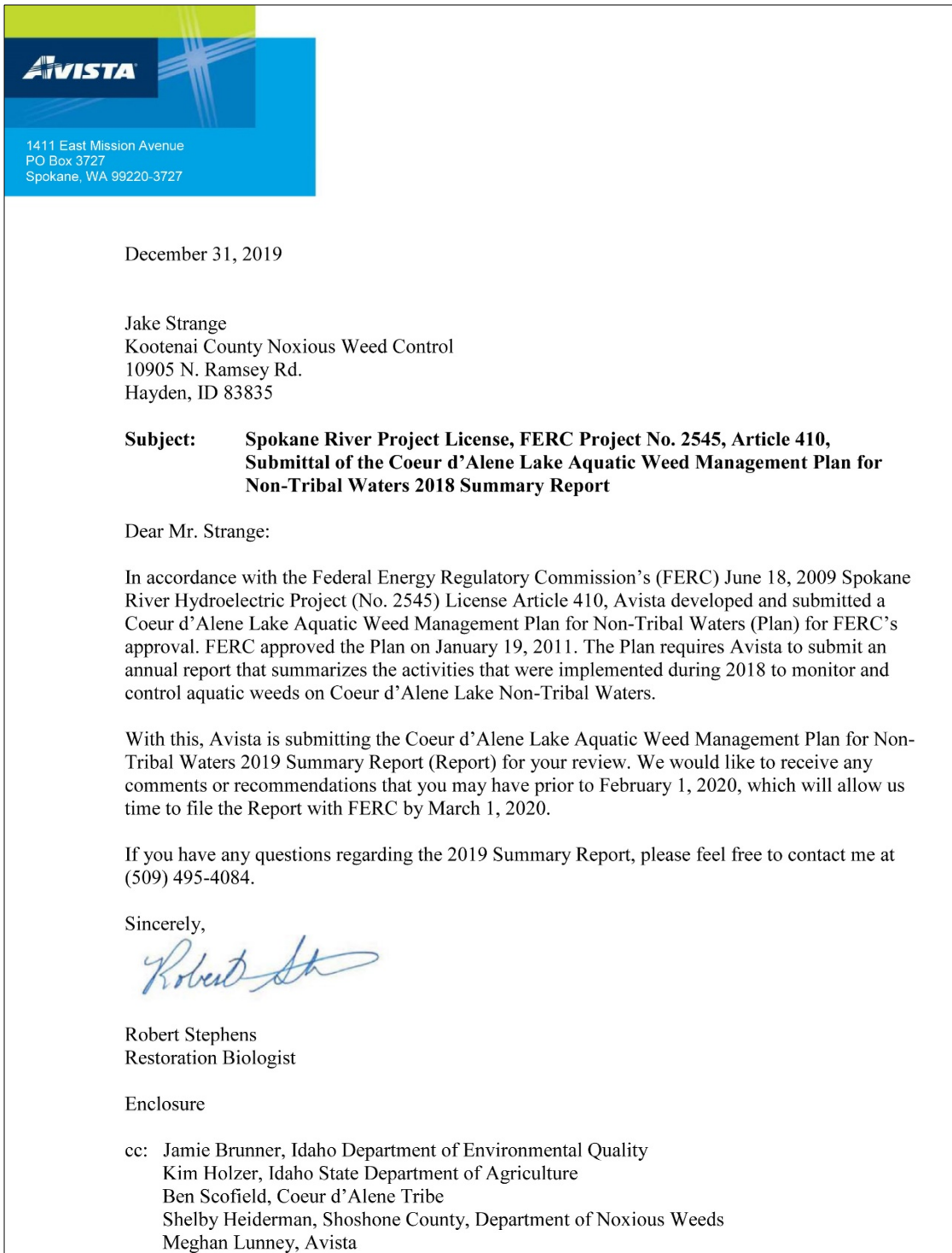
### **ISDA Comment #10**

Page 13, Figure 2: Nice effort and collaboration to achieve target survey coverage.

**Avista Response:**

Avista appreciates ISDA and IDEQ's support and resources to help complete the survey.

## Avista's December 31, 2019 Letter to the Kootenai County Noxious Weed Control Board



December 31, 2019

Jake Strange  
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 Coeur d'Alene Lake Aquatic Weed Management Plan for  
Non-Tribal Waters 2018 Summary Report**

Dear Mr. Strange:

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. The Plan requires Avista to submit an annual report that summarizes the activities that were implemented during 2018 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters.

With this, Avista is submitting the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report (Report) for your review. We would like to receive any comments or recommendations that you may have prior to February 1, 2020, which will allow us time to file the Report with FERC by March 1, 2020.

If you have any questions regarding the 2019 Summary Report, please feel free to contact me at (509) 495-4084.

Sincerely,

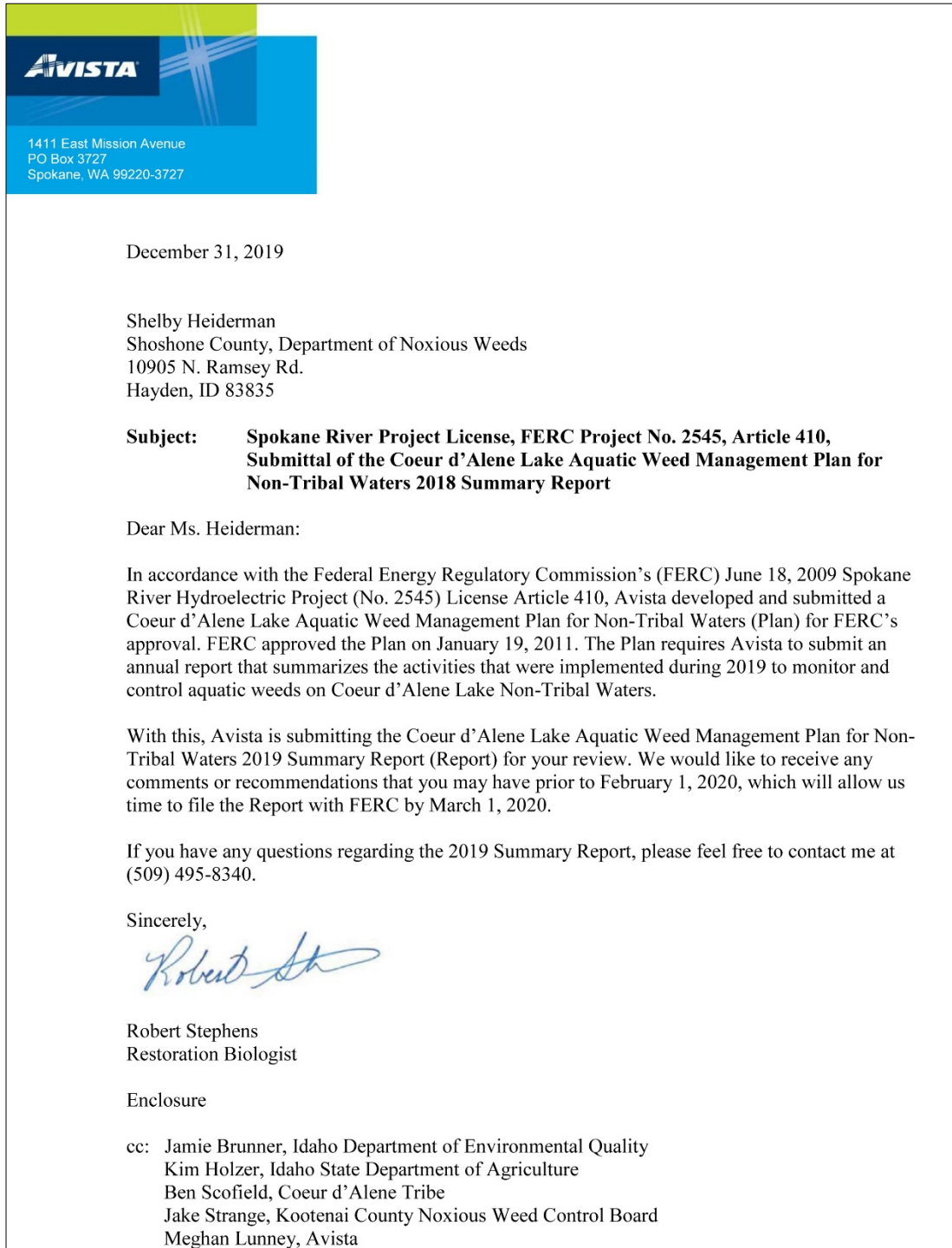
Robert Stephens  
Restoration Biologist

Enclosure

cc: Jamie Brunner, Idaho Department of Environmental Quality  
Kim Holzer, Idaho State Department of Agriculture  
Ben Scofield, Coeur d'Alene Tribe  
Shelby Heiderman, Shoshone County, Department of Noxious Weeds  
Meghan Lunney, Avista

Kootenai County Noxious Weed Control Board did not provide any comments to Avista's Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report.

## Avista's December 31, 2019 Letter to the Shoshone County Department of Noxious Weeds



December 31, 2019

Shelby Heiderman  
Shoshone County, Department of Noxious Weeds  
10905 N. Ramsey Rd.  
Hayden, ID 83835

**Subject: Spokane River Project License, FERC Project No. 2545, Article 410, Submittal of the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2018 Summary Report**

Dear Ms. Heiderman:

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. The Plan requires Avista to submit an annual report that summarizes the activities that were implemented during 2019 to monitor and control aquatic weeds on Coeur d'Alene Lake Non-Tribal Waters.

With this, Avista is submitting the Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report (Report) for your review. We would like to receive any comments or recommendations that you may have prior to February 1, 2020, which will allow us time to file the Report with FERC by March 1, 2020.

If you have any questions regarding the 2019 Summary Report, please feel free to contact me at (509) 495-8340.

Sincerely,

Robert Stephens  
Restoration Biologist

Enclosure

cc: Jamie Brunner, Idaho Department of Environmental Quality  
Kim Holzer, Idaho State Department of Agriculture  
Ben Scofield, Coeur d'Alene Tribe  
Jake Strange, Kootenai County Noxious Weed Control Board  
Meghan Lunney, Avista

Shoshone County Department of Noxious Weeds did not provide any comments to Avista's Coeur d'Alene Lake Aquatic Weed Management Plan for Non-Tribal Waters 2019 Summary Report.