

FINAL Meeting Notes
Lewis River License Implementation
Terrestrial Coordination Committee (TCC) Meeting
December 10, 2008
Lacey, WA

TCC Participants Present: (16)

Peter Carr, EDAW (Consultant)
Ray Croswell, RMEF
Kendel Emmerson, PacifiCorp Energy
David Geroux, WDFW
Diana Gritten-MacDonald, Cowlitz PUD
Eric Holman, WDFW
LouEllyn Jones, USFWS
Cherie Kearney, Columbia Land Trust
Kimberly McCune, PacifiCorp Energy
Todd Olson, PacifiCorp Energy
Kirk Naylor, PacifiCorp Energy
Bob Nelson, RMEF
Nathan Reynolds, Cowlitz Indian Tribe
Mitch Wainwright, US Forest Service

Jeff Boyce, Meridian Environmental
Eileen McLanahan, Meridian Environmental

Calendar:

| | | |
|------------------|-------------|-----------------------|
| January 8, 2009 | ACC Meeting | Merwin Hydro Facility |
| January 14, 2009 | TCC Meeting | Merwin Hydro Facility |

| Assignments from December 10th Meeting: | Status |
|--|----------------------------|
| Reynolds: Submit recommended text to PacifiCorp and Peter Carr (EDAW) regarding Pg 11-6: para 1: ethnobotanical comments | Complete – 12/12/08 |

| Assignments from November 12th Meeting: | Status |
|--|----------------------------|
| McCune: Schedule a 4 hour block in the first week of December and email the TCC with the conference call details. | Complete – 11/12/08 |
| McCune: Invite Cherie Kearney (Columbia Land Trust) to the December TCC meeting and ask that she provide a lands update. | Complete – 11/14/08 |
| Emmerson/Naylor: Add a statement in the Forestlands Chapter that speaks to how money is allocated for forestry | Complete – 12/10/08 |

| Assignments from September 12, 2007 Meeting: | Status |
|--|----------------------------|
| Naylor/Emmerson: Incorporate the following text into the Forest Management chapter of the WHMP, <i>“Prior to any harvest, the areas will be evaluated (ground truth) to determine whether or not the area qualifies as</i> | Complete – 11/12/08 |

| | |
|----------------------|--|
| <i>NSO habitat."</i> | |
|----------------------|--|

| Parking lot items from June 11, 2008 Meeting: | Status |
|--|--|
| Review and discussion of occupancy and productivity of Wood Duck Nest Box and Kestrel Nest Box Program. Should this program be discontinued? | Discuss and address as part of the WHMP annual plan – 1/14/09 |

| Parking lot items from February 10, 2006 Meeting: | Status |
|--|--------------------------|
| PacifiCorp Wildlife Habitat Management Plan (WHMP) Budget (annual) | |
| Conservation Agreement – what is wanted? | Ongoing – 4/28/06 |

Review of Agenda and Finalize Meeting Notes

Kirk Naylor (PacifiCorp Energy) called the meeting to order at 9:15am. Naylor conducted a review of the agenda for the day informed the TCC attendees that PacifiCorp would like to add review of the December 3, 2008 TCC conference call meeting notes. In addition, he asked if the TCC had any other additions to the agenda. No additional changes were requested.

Naylor reviewed the TCC Draft November 12, 2008 and December 3, 2008 meeting notes and the meeting assignments with the TCC attendees and asked for any comments and/or additional changes. No additional changes were requested. The November and December meeting notes were approved at 9:20am.

License Update

Olson informed the TCC attendees that the Utilities will meet with the FERC next week (December 16, 2008) to discuss their perspective compliance management systems and provide the FERC an update of the present implementation status.

In addition, Olson communicated that PacifiCorp conducted a conference call on December 3, 2008 amongst the Settlement Agreement (SA) Parties to address certain inconsistencies between the SA and the new license. PacifiCorp proposed that the Parties remain committed to the SA and its provisions. The meeting was more a matter of process and memorializing the details for the record to outline the expectation of all concerned parties going forward. An amendment will be proposed to address the inconsistency specific to the Cougar Visitors Facility to align the expectations of the SA Parties with the obligations of PacifiCorp.

Lands Update

Naylor and Cherie Kearney (Columbia Land Trust) provided updates of interest in certain lands, however, this discussion is considered confidential and proprietary and not for public viewing.

<Break 9:55am>

<Reconvene 10:00am>

Lands updated continued until 10:30am

Jeff Boyce (Meridian Environmental) joined
Eileen McLanahan (Meridian Environmental) joined

Cowlitz PUD Final Draft Wildlife Habitat Management Plan 30-day Review

The following discussion is specific to comments received from WDFW ([Attachment A](#)) regarding Cowlitz PUD final draft Wildlife Habitat Management Plan (WHMP).

Gritten-MacDonald and McLanahan explained that the purpose of the WHMP is to benefit a broad range of wildlife as opposed to focusing on one species, consistent with the Settlement Agreement. Gritten-MacDonald stated that the WHMP takes a landscape approach to managing habitat and that given the very broad range of the Mt. St Helen's elk herd and the amount of elk habitat available on the Project Works Management Unit (MU), it is appropriate to manage the Devil's Backbone MU for species and habitat diversity. She further stated that the management strategies outlined in the WHMP are consistent with the Standard and Guidelines Document and that some of the Old Growth and some of the Forestlands goals and objectives apply to that property.

WDFW maintains that Old Growth management is already addressed in the conservation covenant area. Outside the conservation covenant area, the Devil's Backbone MU is an early to mid-successional forest and should be managed to improve elk habitat, consistent with the Forestland objectives. WDFW requested modifying text in the WHMP to reflect less emphasis on strategies aimed at developing old-growth habitat characteristics in younger forest, including "allowing for natural succession", which does not represent active management, and more emphasis on improving elk habitat in younger forest.

WDFW requested modifying the title of 4.2.1 to read as follows, "Manage for Species and Habitat Diversity".

General discussion took place regarding concerns about hack & squirt as a method of thinning the purpose, size and management of patch cuts, and the value of permanent elk forage plots for other species. WDFW would like to see stronger language to address the ten acres of opening allotted for in the BiOp (i.e. patch cuts can be added up to ten acres). Discussion also took place regarding an eagle nest which is not on PUD property. David Geroux (WDFW) expressed that the PUD needs to be managing according to the Standards and Guidelines Document. Diana Gritten-MacDonald (Cowlitz PUD) expressed that Section 5.9 (Raptor Management SOPs) of the WHMP addresses WDFW concerns. WDFW suggested that the PUD needs a bald eagle management plan (BEMP). Gritten-MacDonald said that they will add text stating that the PUD would discuss development of a BEMP if any nests are identified on PUD property in the future. Eric Holman (WDFW) mentioned that any new eagle nest on PUD property will trigger the need for a BEMP.

WDFW continues to object to the strategies and management options as they are laid out in the current plan. The management of the Devil's Backbone Unit, outside of the conservation covenant area, lists management strategies and types that are not in line with the Standards and Guidelines Document, which is the driver for the development of WHMP's. WDFW maintains that the Devil's Backbone Unit is an early to mid-successional forest and should be managed accordingly. Old Growth management is already addressed in the conservation covenant area.

WDFW and USFWS agreed that Cowlitz PUD's WHMP describes the suite of potential management tools to be considered for implementation over the life of the license and that the annual planning process is the appropriate forum to discuss how, when, and to what extent these management tools are implemented.

Boyce and McLanahan departed

<Break and working lunch 11:25am>

<Reconvene 12:00pm>

PacifiCorp Draft WHMP 30-day review Discussion

See **Attachment B** for comment and response matrix which details the WHMP communication with the TCC attendees.

Bob Nelson departed

<Break 1:55pm>

<Reconvene 2:00pm>

New Topics/Issues

Shoreline Management Plan Update

Olson informed the TCC attendees that the Shoreline Management Plan (SMP) will be finalized this month and submitted to the FERC for approval. PacifiCorp plans to begin implementation of the SMP in spring 2009.

Annual Report of TCC Expenditures

In accordance with Lewis River SA 10.5, Provide Annual Reports to TCC regarding Fund Expenditures, Kimberly McCune (PacifiCorp Energy) provided the following year end totals (see Attachments A, B & C for more detail).

| | |
|---|----------------|
| Attachment C - Lewis River Yale Land Fund (10.1): | \$3,203,742.47 |
| Attachment D - Lewis River Large Woody Debris (7.1.1): | \$ 10,000.00 |
| Attachment E - Lewis River WHMP Fund (10.8.2): | \$ 313,604.19* |

**** Note: all expenditures from 10.8.2 fund will be made upon the FERC approval of the WHMP, which will be submitted to the FERC on or before December 26, 2008.***

Naylor provided the TCC attendees more detail relating to 12.7 Timber Harvest Expense Allocation as follows: WHMP funding, as described in the Settlement Agreement 10.8.2.1, will not include expenses that occur as a result of timber harvest activities that are considered to be standard forestry practices. However the WHMP requires several forestland management actions that are above and beyond standard forestry practices, as such the expenses associated with these management actions will be included in the WHMP funding. Table 12.7.1 lists all of anticipated timber harvest practices (standard forestry practices and forestland management actions) and the expense allocation between PacifiCorp and WHMP funding. Estimated cost and effort is site specific and determined following harvest planning; therefore it not included in the table.

Table 12.7.1 Timber Harvest expense allocation between PacifiCorp and WHMP

| Practices | PacifiCorp | WHMP |
|---|------------------------|---|
| Spring Timber Harvest Area Survey | | X |
| Fall Timber Harvest Area Survey | | X |
| Harvest Planning | | X |
| Harvest Scheduling | | X |
| First Precut Surveys | | X |
| Property Surveys | X | |
| Timber Harvest Area Traverse | | X |
| GIS update | X | |
| Second Precut Survey | | X |
| Terrestrial Coordination Committee On-Site Meeting | | X |
| Logging Costs (fall, buck, load, haul) | X | |
| Logging Costs (above and beyond standard forest practices) | | X (cannot exceed 10% of logging costs) |
| Timber Harvest Area Inspections | | X |
| Site Preparation for Regenerating (Scarification and Debris Management) | | X |
| Purchase Forage Seed Mix | | X |
| Forage Seeding | | X |
| Permanent Forage Area Development (stump removal, cultivation etc.) | | X |
| Snag Development | | X |
| Road Construction and Maintenance (RMAP activities included) | X | |
| Access Control (gate purchase and placement) | X | |
| Invasive Plant Control (OUST and other competing vegetation) | | X |
| Tree Seedlings | X (Douglas-fir) | X (seedlings other than Douglas-fir and planting above and |

| | | |
|-------------------------|---|-----------------------------------|
| | | beyond standard forest practices) |
| Planting | X | |
| Pre-commercial thinning | | X |

Next Meeting's Agenda

- Review of 12/10/08 Meeting Notes
- Dispersed Shoreline
- License Update
- Lands Update

Public Comment Opportunity

No public comment was provided.

2009 TCC Meeting Schedule

McCune recommended continuing the TCC meetings on the second Wednesday of each month through 2009. The TCC agreed that this is an acceptable schedule.

Next Scheduled Meetings

| January 14, 2009 | February 11, 2009 |
|-----------------------------|-----------------------------|
| Merwin Hydro Control Center | Merwin Hydro Control Center |
| Ariel, WA | Ariel, WA |
| 9:00am – 3:00pm | 9:00am – 3:00pm |

Meeting adjourned at 3:15pm

Handouts

1. Agenda
2. Draft meeting notes from 11/12/08
3. **Attachment A** – WDFW comments on Cowlitz PUD WHMP for Swift 2 Mitigation/Compensation, dated November 21, 2008
4. **Attachment B** – PacifiCorp Lewis River Wildlife Habitat Management Plan Consultation Record, as of December 10, 2008
5. **Attachment C** - Lewis River Yale Land Fund (10.1)
6. **Attachment D** - Lewis River Large Woody Debris (7.1.1)
7. **Attachment E** - Lewis River WHMP Fund (10.8.2)



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

November 21, 2008

Ms. Diana MacDonald
Public Utility District No. 1 of Cowlitz County
P.O. Box 3007
Longview, WA 98632-0307

RE: Comments on Cowlitz PUD WHMP for Swift 2 Mitigation/Compensation

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to comment on the Wildlife Habitat Management Plans (WHMP) that Cowlitz PUD submitted on October 24, 2008 as a part of the relicensing requirements for the Swift 2 Hydroelectric dam. WDFW looks forward to working with Cowlitz County in further refining the WHMP and in assisting with implementation of that plan.

After reviewing the WHMP, WDFW has the following comments and concerns about the plan. They are addressed by section in the following letter. Our goal is to expand upon the working relationship we have with Cowlitz PUD, and to ensure the protection and enhancement of the resources associated with the Lewis River Basin.

Devil's Backbone Management Unit:

Aside from the Conservation Covenant Area, management of the Devil's Backbone needs to be focused on forage enhancement combined with big game hiding cover. This management area falls within the winter range for the Mt. St. Helen's elk herd, so forage enhancement is vital, as indicated in the Standards and Guidelines Document, Section 3.9.4 Objective A. To accomplish this, WDFW recommends the following management actions be added to enhance forage production:

The preferred method to enhance forage in a forested plant community would be to harvest and remove select trees, eliminate the majority of ground clutter which would allow elk and deer to move unencumbered and facilitate active forage management, and then promote new growth of herbaceous plants in the understory. If the issue of timber harvest funding is not resolved or if the budget does not allow for a full harvest, there remains the potential to leave downed wood in these areas. Taking a phased approach to implementing these cuts would spread the cost over several years.

Within timber stands in the Devil's Backbone Unit the creation of new forage areas by reducing stem densities with pre-commercial thinning or with the "hack and squirt" method is one option for forage enhancement. Lowering stem densities to approximately 150 stems/acre would allow for forage development without the necessity of a clear cut. This density would also provide a low amount of hiding cover. The application of a legume and grass seed mix after harvest will allow for forage enhancement and assist in invasive plant control and slope stabilization. This form of management would be appropriate for Management Units 2,5,6,8, and 9.

The expansion of the existing meadow and/or the creation of permanent elk forage plots would also enhance forage in the Devil's Backbone Unit as a whole. Planting a grass and legume seed mix in the first year after site preparation would establish highly palatable forage within the patch cut. Conifer encroachment control techniques could then be used in future years to maintain the opening at minimal cost. Ideally, these patches would be between 5 and 20 acres and placed in areas with stem densities of between 250 - 300 stems/acre or with canopy cover >70% so that thermal cover would continue to be provided adjacent to the forage areas. Patch cuts could also be placed in areas that are adjacent to riparian areas, which are used as travel corridors by elk and deer. A phased approach could be taken, where the first patch cut could be done (up to 10-acres) and then additional patch cuts could be added into other areas of the unit in subsequent years.

Clearings created in the DBMU could easily fill with invasive species without active management, as has been seen at the 1-acre meadow within the Unit. These areas also should be managed according to the Forestry section of the Lewis River Standards and Guidelines, which refers to improving forage opportunities for elk and deer (Lewis River Standards and Guidelines, Section 3.9.2). These patch cuts, if managed correctly, will provide areas to enhance elk forage within the unit. To bolster forage and to reduce invasive encroachment the application of an approved seed mix will be necessary.

4.1 Management Activity Overview

The activity overview continues to refer to "*minimal silvicultural intervention*" and states that the overall goal is to "*provide old-growth habitat characteristics*". During the initial site visit to the Devil's Backbone, and in the letter of response to the original draft management plan dated August 6th, 2008, WDFW expressed that the management of this area in it's entirety for old growth habitat is not consistent with the Settlement Agreement or Standards and Guidelines. This was reiterated during the field trip with the TCC to the unit on 9/9/2008. Of the goals for Forestlands, the establishment of old growth for the forest type in Devil's Backbone (mid-successional) is not listed. The criteria for areas managed to promote old growth all contain provisions that specifically state that forest types with *Mature*, *Forested Buffers* and *Existing Old growth* (Standards and Guidelines, Section 3.1.4 Objectives A-D) are the only types that will be managed for Old Growth. WDFW recognizes the importance of Old Growth Habitat, but management of WHMP lands is to address goals and conditions over the life of the license. Within the WHMP, Cowlitz PUD identifies the fact that these areas will not progress to old growth during the life of the license in Section 3.1.1, Paragraph 2, Bullet One:

No younger stands are projected to move into the old-growth stage within the new license period.

Because of this, reporting that "*Allowing for natural succession without silvicultural intervention addresses the goals and objectives for Old-Growth, Riparian and Forestland habitat, as outlined in the SGD*" in paragraph 6 of Section 4.3.1 is not correct. Allowing for succession does address some of the goals in the Old Growth Guidelines, but managing primarily for old growth in this Unit does not meet the Forestland Guidelines and is inappropriate for current conditions of the stand. Specifically the overall goal from Section 3.9.4 of the Standards and Guidelines Document, which states:

Goal: *Promote forestland species composition and structures that benefit wildlife and provide an appropriate mosaic of big game hiding cover and forage.*

The mid-successional forests found in the DBMU need to be managed according to this guideline. A hands off approach will not address the needs of the unit, nor will it meet the requirements set forth in Section 10.8.1 of the Settlement Agreement and Section 3.9.4 of the Standards and Guidelines Document.

Annual Budget

WDFW continues to be concerned about the function of the budget associated with management activities in this WHMP. In previous discussions at Terrestrial Coordination Committee (TCC) meetings, WDFW expressed concern about the percentage of allotted annual funding going to administrative costs instead of on the ground mitigation (TCC Meeting notes, 8/13/08 and 9/10/08). By the current plan, 40% of the annual budget (\$6760 of the \$16,800) will go back to the PUD for several types of “*plan*” and “*activity administrative costs*” (Cowlitz PUD 2009 Annual Plan, Page 5, Table 2.1-1). These costs were discussed at a TCC meeting (8/13/08), but it is still unclear how these administrative costs and amounts were arrived at, and if the management of the WHMP funds is being done proficiently. A strict accounting of funds expenditure from the previous year needs to be included with each future annual plan so that the TCC can view costs line-by-line. This accounting will assist the TCC in determining whether the PUD is able to manage these lands in a cost-effective manor or if a third party should be contracted, as laid out in Section 10.8.3 of the SA.

Cowlitz PUD’s interpretation of Section 10.8.2.3 of the Settlement Agreement in reference to how timber harvest receipts are processed while conducting management activities is also of concern to WDFW. Several parties within the TCC, including WDFW, understood Section 10.8.2.3 of the Settlement Agreement to refer to stumpage rates, which are the mill profits after the expense of harvest and transport are taken out. This issue becomes pertinent to the WHMP because it has been determined that to improve habitat for a number of species that currently, or potentially could, utilize the Devil’s Backbone Unit, a Pre-commercial thin in some sections is necessary. Specifically at question is the last sentence of Section 10.2.8.3 of the SA:

Any funds derived from management of lands subject to the WHMPs, including compensation for timber removed pursuant to the WHMPs, shall be retained by the Licensees for their respective properties.

WDFW believes that “*funds derived*” and “*compensation*” refers to profits from timber harvest, which would be kept by the utilities, but that the money garnered from trees on mitigation lands would first offset the costs associated with harvest and removal. Any remaining dollars after cost (stumpage) would then be kept by the utility. The assertion by Cowlitz PUD that they are entitled to mill receipts without mill dollars first paying for harvest expense is contrary to the norms of timber harvest in Washington State. As stated in an email sent by WDFW, the United States Fish and Wildlife Service (USFWS) and the Rocky Mountain Elk Foundation (RMEF) to the TCC on 9/26/2008, the Washington State Department of Revenue bases taxation of timber harvests upon the mill receipts after costs are removed (RCW 84.33.074(b)). The Washington State Department of Natural Resources accept bids for harvest on their lands by stumpage rates (personal communication with Jon J. Tweedle, Assistant Division Manager, Product Sales and Leasing Division, WADNR).

In addition, this was the standard under the previous agreement with PacifiCorp for the Merwin Plan and will be the standard for PacifiCorp forestry lands under the new joint license. Because this method of assessing timber harvest revenues is the standard in Washington State, this was the interpretation that the Washington State Department of Fish and Wildlife was working under

when agreeing to this section of the Settlement Agreement. The interpretation by Cowlitz PUD is not the accepted norm, even among the other licensee for this agreement. WDFW does not object to the PUD keeping profits that are beyond the expenses associated with a timber harvest, but the Agency does not believe that Cowlitz PUD is entitled to gross revenues from timber harvest.

Section 3.1.4, Objective A and Section 4.2.8–

Comment states that “...contains one 1-acre meadow that is not selected for intensive management for elk”. WDFW has expressed interest in managing this area for elk during site visits and in TCC meetings. Provisions for possible elk forage enhancement need to be included in the WHMP. Potential elk enhancement activities include: using grass seed mixes that are high in forage value, reducing or controlling canopy cover and/or expanding the meadow to increase forage opportunity. There are specific clauses for managing meadow areas for elk within the Settlement Agreement. This is directly referenced in Schedule 10.8, Section 2.4, Farmland and Meadow Management which states:

Provide and maintain quality forage and browse conditions for elk and deer from November through 30 April (including reducing disturbance) while also creating or maintaining screening, cover, and structure between fields or along edges of meadows to encourage use by other wildlife species.

It is unclear how this meadow would be managed, if it were not managed for elk. Efforts to enhance this area for one of the associated HEP species (Elk and Savannah Sparrow) need to be included in the plan.

In addition, management of WHMP lands are subject to the oversight of the TCC. There are several sections, including Section 3.1.4, of the document that create a tone that Cowlitz PUD alone will decide what management or management potentials will take place on WHMP lands. Section 14.2.3b of the Settlement Agreement refers to the role of the TCC:

Review information and oversee, guide, and make comments and recommendations on implementation and monitoring of the terrestrial and aquatic PM&E Measures, including plans;

There are several sections of the WHMP that references Cowlitz PUD as making decisions regarding management of WHMP lands. It is up to the TCC how WHMP lands are managed, but Cowlitz PUD, as a member of the TCC, can offer suggestions on potential management but not eliminate them. The statement “not selected for intensive management for elk” needs to be removed, as well as other references that state Cowlitz PUD will make management decisions independently (such as Section 2.1, paragraph 6). The potential to enhance the meadow area for elk needs to be included in the management plan to address this goal.

4.3.7 Manage Raptor Sites, Paragraph 3

There is no plan discussed in dealing with the known Bald Eagle nest site within the Project Works Management Unit. As discussed at the TCC meeting on 8/13/08, WDFW believes that a Bald Eagle Management Plan is needed for this nest. Cowlitz PUD stated at the meeting and in the text of this section that they did not believe that the eagles were adversely impacted by ongoing activities, and that while reconstruction was taking place in 2002 the eagles “hung around and built a nest”. This does not qualify as a survey for impact. Occupancy surveys by PacifiCorp of the nest in 2002 showed that no young were successfully fledged from this nest that year. This may be an indicator that the nesting pair was in fact impacted by activities in the

area, and that they may continue to be impacted by future construction or maintenance. Management is required by the Standards and Guidelines Document Section 4.3.4:

Objective B: *Develop a management plan for nesting bald eagles, considering site-specific requirements, within 3 years of WHMP implementation, and revise upon discovery of a new active nest site.*

The development of an Eagle Nest Management plan is necessary for the existing nest, and the creation of new plans will be required if new nests or communal roosts are found.

5.4.2 (Meadow SOPs) Management Actions:

Add forage enhancement and Meadow expansion to the list of potential actions.

5.4.2.1, Meadow Management, Conifer Control, Bullets One and Two:

The SOP currently lists 10 year intervals to evaluate conifer cover encroachment and for the hand or mechanical removal of conifers at the meadow. It would be more cost effective and would return a greater degree of success by conducting these activities at a maximum of 5-year intervals when conifers are still small enough to be easily removed.

5.7.3.3 Patch Cuts, BMPs, Bullet 3:

This bullet states: *“Do not scarify or reseed; patch cuts are not intended to be maintained or managed over time”*. Reseeding for forage enhancement is one of the objectives called out in the Lewis River Standards and Guidelines under Section 3.9.2, Utility lands, Bullet 4, as well as under Objective A of the Forestlands Habitat Goals and Guidelines (Lewis Standards and Guidelines, Section 3.9.4). This section refers to the importance of creating a *“mix of forage and hiding cover for elk”*, while Section 3.9.2 discusses seeding not only for forage, but for erosion control and for limiting invasive species. The potential to scarify and reseed both need to be available options for patch cuts.

WDFW looks forward to further discussing this WHMP with Cowlitz PUD and the rest of the TCC at future meetings, and to reasonably resolving any differences that exist over interpretation and implementation of the Settlement Agreement. The enhancement and protection of a variety of habitats on Cowlitz MU lands is a shared goal that WDFW looks forward to assisting throughout the life of the license. Thank you for your continued cooperation and consideration with the creation of these management plans.

Sincerely Yours,



David Geroux
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Cc: Curt Leigh WDFW, Travis Nelson WDFW, David Geroux WDFW, Lou Ellyn Jones USFWS, Diana MacDonald Cowlitz PUD, Kimberly McCune PacifiCorp, TCC Members

Attachment A

The intent of this email is to express Washington State Department of Fish and Wildlife (WDFW), Rocky Mountain Elk Foundation (RMEF), and the US Fish and Wildlife Service (USFWS) interpretation of the following statement in Section 10.8.2.3 of the Settlement Agreement:

Any funds derived from management of lands subject to the WHMPs, including compensation for timber removed pursuant to the WHMPs, shall be retained by the Licensees for their respective properties.

The above mentioned signatories interpret "compensation for timber removal" to refer to profits garnered after the expense of the harvest are covered. Profits are defined as "the excess of returns over expenditure in a transaction or series of transactions" (Merriam-Webster Dictionary, 2008). "Compensation for timber removed pursuant to the WHMPs", according to the Settlement Agreement, includes the profit from the timber. We do not agree it includes the cost of removing the timber. Timber is sold based on its value. When bidding for a timber harvest, the purchaser bids on and pays the price on the stump, which is the profit that goes to the utility. We are unaware of any company that inflates profits by adding costs.

Under RCW 84.33.074

(<http://apps.leg.wa.gov/RCW/default.aspx?cite=84.33.074>), the Washington State Department of Revenue defines the taxation of timber profits for small timber harvest owners as: "the tax is based on the actual amount paid for stumpage or the amount received from the sale of logs less the costs of harvesting and delivering to the buyer". The Washington State Department of Revenue uses this as the guideline to tax timber harvests statewide. The statement of "less the costs of harvesting and delivering to the buyer" speaks directly to the intent of the Settlement Agreement, Section 10.8.2.3. The signatories to this email believe that the term "compensation" was referring to the profits of the harvest, as defined in this RCW. Because of this legal definition and industry standard of how timber harvest dollars are assessed; Cowlitz PUD has no reasonable expectation to timber harvest dollars without the associated costs of harvest being deducted.

The Washington State Department of Natural Resources defines stumpage bids as: "The costs of cutting, removing, and hauling that tree is borne by the bidder, so therefore the bidder has accounted for those costs in their stumpage bid. Revenue is recognized when the purchaser pays the stumpage they have bid" (Personal communication via email, Jon J. Tweedale, Assistant

Division Manager, Product Sales and Leasing Division, Washington State Department of Natural Resources).

The purchase of the Devil's Backbone Unit was to offset an impact created by the dam that the PUD uses, and the trees on that land are a part of that mitigation. Mitigation is intended to lessen an impact; it is not a profit-making venture. The purpose of the property is to enhance wildlife habitat including elk. Elk benefit from increased forage production resulting from timber harvest and locally elk forage is a limiting factor.

Interpretations that transfer enhancement efforts into profits for the PUD without benefitting wildlife is contrary to the purpose of a wildlife mitigation plan. The Settlement Agreement refers to the purchase and management of the Devil's Backbone Unit and "resource benefits associated with the purchase" and as "partial fulfillment of Cowlitz PUD's mitigation obligations" (Section 10.6.1). The "mitigation obligation" that is referred to is hinged upon the enhancement of habitat on this property. The intended obligation will not be met by using mitigation dollars to offset costs of harvesting timber originally purchased as a part of a mitigation obligation.

We appreciate your time and allowance for us to clarify our position. We look forward to discussing this issue further at TCC meetings and hope that we can come to an agreement in a timely fashion.

**PacifiCorp Energy
Lewis River
Wildlife Habitat Management Plan Consultation Record**

December 2008

| Comment/ Question Date | From | Comment/Question | Response Date | Response | From |
|-----------------------------------|----------------------|---|----------------------|--|-------------------|
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-3: para 1: change text to read: “The general chapters are the Introduction...” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-3: para 1:, capitalize “Introduction, Management Area, and Administration chapters” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-3: change bullet point list of habitat management chapters to chapter titles to match Table of Contents | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-3: change bullet point list of plan-wide goal chapters to chapter titles to match Table of Contents | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-4: para 1: change text to read: “The species association chapter provides a summary of general life history and habitat information for selected species found within the plan area.” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 1-8: para 4: capitalize “Vegetation Cover Type Mapping ... and Botanical Surveys” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 2-1: para 1: Change text to read “...terrain of rolling hills that eventually transitions to flat floodplain land near the... | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 2-1: para 1: Start new paragraph at: “The Lewis River basin has a predominantly marine climate ” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 2-2: para 1: change text to “240 feet (73m) above mean sea level (AMSL) at Merwin Dam to approximately 2,500 feet (762m) AMSL on lands...” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Page 2-6: para 1: necessary to include final sentence? Possible to change maps in Appendix 2-2 to simply remove School Lease from maps? | 12/15/08 | Appendix 2-2are the same maps that are in Exhibit A of the Settlement Agreement, which is finalized and cannot be changed. The final sentence was to <u>qualify the discrepancy between acres in the Settlement Agreement to present day.</u> | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 2-6: bullet point 4: explain, define or use better euphemism for “site creep” | 12/10/08 | “where needed to prevent site creep” was removed from this bullet | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 2-6: para 4: change text to: “identify opportunities for enhancement where feasible.” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 4-1: para 2: comment: I disagree that old growth stands are “composed primarily of large Douglas fir trees...” and disagree that old growth stands have “high canopy closures” Very old stands may have virtually no Douglas fir component left, and old stands with very large trees may have a open canopy between remnant individual trees. Stands with these characteristics may not be found on the WHMP area, but that does not mean that old growth should be characterized narrowly. | 12/10/08 | PacifiCorp did not accept the change; TCC approved language as is. No action required | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 4-4: para 1: phrase “greater horizontal and vertical canopy structure than is generally found in mature canopy stands” is not found in the para 3 bullet list point on page 4-2. Should include there also? | 12/10/08 | TCC agreed no change needed. No action required | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 4-5: para 1: Regarding phrase, “Although these acres will not continue to be managed as old-growth conifer habitat, many of these acres will be protected as...” Comment: how many is “many”? Is it possible to specify how many? To approximate a percentage? | 12/10/08 | PacifiCorp will modify text to read as follows:” Although these acres will not continue to be managed as old-growth habitat, these acres will be protected as 228 acres (92 ha) of mature conifer, 163 acres (66 ha) of riparian buffer, 4 acres (1.6 ha) of wetland buffer and 154 acres (163 ha) of shoreline buffer.” | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 4-9: para 5: more clearly define “hack-n-squirt” | 12/10/08 | PacifiCorp will modify the text as follows, “Snags may be developed by a variety of methods, such hack-n-squirt (i.e., herbicide applied to a cut [hack] through the tree bark into the cambium layer) and topping. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 4-9: para 7: separate ideas now presented as single paragraph into a “thinning paragraph” and a “import of LWD paragraph” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 5-12: para 2: bullet point 2: Change text to: “ A list of shrubs is provided in Chapter 7 (Shrubland Management), Appendix 7-3” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |

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| 12/9/08 | Cowlitz Indian Tribe | Pg 5-12: para 2: bullet point 3: Insert period between "...may be felled if needed. All tree tops..." | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 5-13: para 2: bullet point 1: comment: Where on data sheet is space to "evaluate waterfowl and bat habitat quality"? | 12/10/08 | PacifiCorp will add a Waterfowl and Bat Habitat section heading within Appendix 5-2 Wetland Annual Inspection Form and Appendix 5-3 Wetland Annual Inspection Form | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 6-9: para 6: change text to: "There are 34 riparian mixed forest..." | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 6-12: para 4: more clearly define "hack and squirt": see note 16 above. | 12/10/08 | PacifiCorp will modify the text as follows, "hack-n-squirt (i.e., herbicide applied to a cut [hack] through the tree bark into the cambium layer). | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 6-12&13: Comments: <ul style="list-style-type: none"> a. Riparian areas damaged by anthropogenic processes will have a restoration plan completed within 5 years? Why so long? No more than 3 years should elapse before plans for restoration are submitted to TCC for review; 2 is even better. b. Propose that restoration plans should not only be reviewed by TCC but plan must be accepted by TCC majority before PacifiCorp is authorized to implement plan. c. TCC also needs opportunity to visit implemented restoration. d. No other habitat-focused chapter has Restoration as a Management Action. I propose that other habitat-focused chapters, particularly chapters 5, 7, 8, 9, 10 and 11 would benefit from having similar restoration text as is provided in this Chapter 6 | 12/10/08 | a. Section 6.5.3 2nd paragraph, 1st sentence should read: "The damaged riparian areas will be reported to the TCC following the discovery of the area at the next scheduled TCC meeting, documented in that year's Annual Report, and a restoration plan for the area will be completed within 5 years." Modify Table 6:6.1 to insert the following line above Riparian Area Restoration <div style="text-align: center;"> Riparian Area Damage Identification Optional¹ January 1 to December 31 1 hour per area Report to Terrestrial Coordination Committee at next schedule meeting and annual report </div> b. Section 6.5.3 2nd paragraph, 3rd sentence will be modified to "Restoration plans will be reviewed and accepted by the TCC prior to implementation and should include the following:" c. Section 6.5.3 sentences following the bullets "Upon completing the restoration, the TCC will be provided an opportunity to visit the site." d. The following section will be added to Chapter 3. WHMP lands that are identified as being significantly damaged by anthropogenic processes will be reported to the TCC at the next scheduled TCC meeting and documented in the annual report. A restoration plan will be completed within a year of discovering the site, include the same criteria listed in section 6.5.3, and will be reviewed and accepted by the TCC prior to implementation. Upon completing the restoration, the TCC will be provided an opportunity to visit the site | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 7-2: Objective B: Change text to: "Within 8 years of WHMP implementation, revise management actions..." | 12/10/08 | The goals and objective language was determined by the TCC and finalized in June 2006, therefore language in the objectives cannot be changed. No action required. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 7-6: para 1: comment: 15 years too long between shrubland inspections. Too much opportunity for invasive species to establish foothold or forest succession to commence. 10-year intervals will be more effective. 6-year intervals even better. There will be little to no opportunistic inspections of shrublands, only programmatic | 12/10/08 | Modify 15 year rotation to 7 year rotation | PacifiCorp Energy |

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| 12/9/08 | Cowlitz Indian Tribe | Pg 7-7: para 3: “excellent sentence re “...actions to be performed by PacifiCorp or authorized contractor”. But sentence is not in <i>Management Actions</i> sections of Chapters 4, 5, 6, 9, 11, 12, 13, 14, 15 and 16. Please also put it in these chapters | 12/10/08 | TCC had decided to remove this comment in earlier meeting. It was an error that this comment remained in the review draft of the WHMP and will not be in the final WHMP. | PacifiCorp Energy |
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| 12/9/08 | Cowlitz Indian Tribe | Pg 7-9: para 1: bullet point 1: Change text to “...perimeter around the preferred shrub species...” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 7-9: para 3 bullet 4: Awkward structure of ideas; please clarify | 12/10/08 | Modify text to read as follows, “Mark the shrubland boundary with flagging to preserve the shrubland before conducting timber harvest activities”. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 9-15: Comment: Nice glossary. Maybe similar section needed to overcome jargon in other Chapters? | 12/10/08 | It was decided that developing a glossary for each chapter would be too time consuming at this point; therefore no action was required. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 10-9: Comment: Himalayan Blackberry – <i>Rubus armeniacus</i> or <i>Rubus discolor</i> (as in Appendix 13-1)? Also throughout other chapters. Decide on one then global search and replace. | 12/10/08 | PacifiCorp has accepted the change and will incorporate <i>Rubus armeniacus</i> into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg. 10-10: para 1: comment: aquatic management area signs to alert personnel should be posted at both riparian areas and wetland areas | 12/10/08 | That is the intent of this paragraph. No action required. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 11-4: para 3: change text to: “...Units 21 and 24...” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | <p>Pg 11-6: para 1: comments:</p> <p>a. All Oak habitats are ethnobotanically significant patches -- especially the one noted by Kendall that contains Common Camas. All Oak stands within the WHMP area should be inspected at least once shortly after issuance of FERC license, during the phenologically correct season, to determine if other stands also contain ethnobotanically significant spp. i.e. Camassia sp., Brodiaea sp. Fawn lilies, etc.</p> <p>b. The Lodgepole pine/Big Lava Bed area near the west end of Swift Reservoir noted in the Unique Areas is ethnobotanically important due to the presence of Kinnikinnik.</p> <p>c. Mature Cedar groves are ethnobotanically important. Some Cedar grove areas in close proximity to WHMP lands are registered archaeological sites because of cedar bark gathering evidence or culturally modified trees (CMTs). These sites include CL629 and SA488, and bark gathering activities at these sites were dendrochronologically dated to 1771, prior to Euroamerican exploration and settlement. These sites were located and recorded in late 2004, after the PacifiCorp’s Historic Properties Management Plan (HPMP) was prepared. Any Cedar grove within the WHMP area should be examined for similar archaeological evidence by qualified personnel as part of the forestry pre-action inspections described in Section 12.5.4, 12.5.5 and 12.5.6. Any newly located individual CMT or areas of CMTs should be conserved, the HPMP should be updated to include it, and proposed forestry actions at the site should be suspended until Section 106 consultation between PacifiCorp and Tribes results in a joint determination.</p> | 12/10/08 | <p>a. It was decided that inspecting the oak habitats for ethnobotanically significant plants exceeded the goal and objectives for the unique areas; therefore would not be included in the WHMP. Identifying ethnobotanically significant plant areas would be completed by PacifiCorp/Tribal consultation separate from the WHMP. No further action is required.</p> <p>b. Modify the last sentence of 11.3.5 to “Currently, the lodgepole pine areas in Unit 21, 24, and 26 and oak stands identified in Table 11.3.1 are the only ethnobotanically significant plant areas known to exist on WHMP lands (Appendix 11-1).”</p> <p>c. No action required.</p> | PacifiCorp Energy |

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| 12/11/08 | Cowlitz Indian Tribe | <p>Page 11-6 Insert the following text: “Section 11.3.5 Ethnoecologically Significant Areas Ethno-ecologically significant areas are areas where plants or other raw material resources were traditionally gathered by the Cowlitz Tribe and/or the Yakama Nation throughout the Lewis River basin.” Areas where plants common on the Wildlife Habitat Management Plan lands achieve an unusual density or unusual quality may also reach ethnobotanically significant status. PacifiCorp may also be alerted to an ethnobotanically significant area through formal notification by a designated Tribal representative. Determination that an area is ethnobotanically significant will be made by consulting with the Cowlitz Tribe and/or the Yakama Nation. If the proposed area is determined to be significant, it will be mapped and recorded in the Unique Areas database (Section 11.5.3). Certain ethnobotanically significant areas (such as Oak Stands) may be simultaneously classified as Unique Areas because of habitat value, and as Ethnobotanically Significant areas.</p> <p>Ethnoecologically significant resources are not limited to plant materials, but also include certain kinds of crypto-crystalline silicate (CCS) rocks such as jasper, flint, chert, and chalcedony. These materials may occasionally be found exposed in rocky outcrops, but are more commonly found as abraded cobbles in river beds. No such areas are currently known or expected to be discovered within Wildlife Habitat Management Plan lands. Nonetheless, any area identified by PacifiCorp as containing ethnoecologically significant raw material resources at an uncommon density or unusual quality will be reported to the Cowlitz Tribe and the Yakama Nation. PacifiCorp may also be alerted to an ethnoecologically significant area through formal notification by a designated Tribal representative. Determination that an area is ethnoecologically significant will be made by consulting with the Cowlitz Tribe and/or the Yakama Nation. If the area is determined to be significant, it will be mapped and recorded in the Unique Areas database (Section 11.5.3).</p> | 12/15/08 | PacifiCorp will accept the text with the following changes to 2 nd paragraph 4 th , 5 th , and 6 th sentence. “Nonetheless, any area identified by Cowlitz Indian Tribe or Yakama Nation containing ethnoecologically significant raw material resources at an uncommon density or unusual quality may be classified as unique area. Determination that an area is ethnoecologically significant will be made by the Cowlitz Tribe and/or the Yakama Nation” | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | <p>Pg. 11-9: comment: Please insert new section 11.5.5 Ethno-ecologically significant site management: “Ethno-ecologically significant resources are not limited to plant materials but also include certain kinds of crypto-crystalline silicate (CCS) rocks such as jasper, flint, chert or chalcedony. These materials may occasionally be found exposed in rocky outcrops, but are more commonly found as abraded cobbles in river beds. No such sites are currently known or expected to be discovered within WHMP lands. Nonetheless, any areas determined to contain ethnoecologically significant resources will be recorded in the Unique Areas database. A management strategy will be developed with the Terrestrial Coordination Committee to protect and maintain the site. Management strategies will be developed on a case-by-case basis and will be dependent on location, resource, and potential disturbances.</p> | 12/15/08 | This comment was retracted by the Cowlitz Indian Tribe. No further action required. | PacifiCorp Energy |

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| 12/11/08 | Cowlitz Indian Tribe | <p><u>Revise Section 11.5.4 to read as follows:</u></p> <p><u>“Section 11.5.4 Ethnoecologically Significant Area Management</u></p> <p>Most of the ethnobotanically significant plants are locally common and are widely distributed on the Lewis River Wildlife Habitat Management Plan lands. Areas that are determined to be ethnobotanically or ethnoecologically significant will be recorded in the Unique Areas database. A management strategy will be developed with the Terrestrial Coordination Committee to protect and maintain the area. Management Strategies will be developed on a case-by-case basis and will be dependent on location, species, and potential disturbances.”</p> | 12/15/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | <p>Appendix 11-2: Comment: please add to list of ethnobotanically significant plants:</p> <ul style="list-style-type: none"> a. Garry Oak (Quercus Garryana) b. Pacific Yew c. Western Crabapple d. Oceanspray e. Serviceberry f. Great Camas g. Brodiaea Sp. h. Chocolate Lily i. Fawn Lily j. Avalanche Lily k. Death Camas l. False Hellebore | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | <p>Appendix 11-2: Comment:</p> <ul style="list-style-type: none"> a. Kinnikinnik is in the <i>Ericaceae</i> family b. Western Red Cedar is in <i>Cupressaceae</i> family | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | <p>Pg 12-12: Para 3:</p> <ul style="list-style-type: none"> a. Bullet 2: define “hack and squirt” again. b. Bullet 4: change text to: “24 feet (6.1 to 7.3 m), lower branches of the tree should be pruned...” | 12/10/08 | <p>a.PacifiCorp added a definition so that the sentence now reads: Thin by using a hack-and-squirt method (herbicides applied to a cut [hack] through the tree bark into the cambium layer) of killing young trees ...</p> <p>b.PacifiCorp has accepted the change and will incorporate into the WHMP document.</p> | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 12-12: para 6: Define “slides” in Point 1. Do you mean landslides? | 12/10/08 | PacifiCorp changed the word “slides” to: small debris slumps | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 12-36: para 4: query: Are any special areas noted in forestry surveys that rate above a certain threshold capable of being transferred to Unique Areas Chapter 11? | 12/10/08 | PacifiCorp changed the sentence to read: Any additional information from the first precut survey (identification of previously unmapped unique areas or other important features) that may need to be updated into the geographic information system database should be completed. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 12-40: para 3: change text to: “24 feet (6.1 to 7.3 m), lower branches of the tree should be pruned...” | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 12-40: para 5: comment: the definition of the hack-n-squirt method! Excellent! | 12/10/08 | No action required. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 13-2: para 3: Objective C: change text to: “...A and B designated weeds...” | 12/10/08 | The goals and objective language was determined by the TCC and finalized in June 2006, therefore objectives cannot be changed. No action required. | PacifiCorp Energy |

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| 12/9/08 | Cowlitz Indian Tribe | Pg 14-13: query: Possible to add sentence regarding reintroduction of ESA-listed but heretofore locally extirpated raptor species re-entering and using plan area? i.e. if California Condor are re-introduced to the Columbia River Gorge and move across or utilize WHMP lands, what will be PacifiCorp's response protocol? | 12/10/08 | PacifiCorp will add the following sentence to the end of the first paragraph, "If additional terrestrial species are federally or state listed as threatened or endangered and known to exist in the vicinity of the Lewis River, then PacifiCorp will go into consultation with the appropriate agency and will develop a management plan for that species on WHMP lands." | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 15-1: para 4: query: "herptiles"? Really? How about: "Reptiles and Amphibians" | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 15-2: para 3, Objective c: define "site pioneering" and "site creep". | 12/10/08 | The goals and objective language was determined by the TCC and finalized in June 2006, therefore language in the objectives cannot be changed. No action required. | PacifiCorp Energy |
| 12/9/08 | Cowlitz Indian Tribe | Pg 15-9: para 3: If "site pioneering" and "site creep" were defined earlier in chapter than okay to use here. | 12/10/08 | PacifiCorp will modify the following text: Page 15-9 3 rd paragraph 1 st sentence to: "The Recreation Resource Management Plan requires that site pioneering (i.e., newly established campsites) around the shorelines be monitored annually and site creep (i.e., expanding the existing site by 10 or more percent) at designated dispersed shoreline sites be monitored every 4 years." | PacifiCorp Energy |
| 12/8/08 | US Fish & Wildlife Service | Based on our participation in the development of these plans over the last year, we have no additional comments on the Wildlife Habitat Management Plan. Our only recommendation relates to the forestry chapter, consistent with the concerns expressed by the Washington State Department of Fish and Wildlife. The approach for planning harvest needs to take into account conditions on the landscape, rather than proposing harvest based primarily on the forage/cover ratio of a particular unit. While meeting goals for cover/forage ratios is important in deciding whether to harvest a particular unit, adjacent ownerships and the condition of habitat on those lands should also be considered. We suggest that aerial photos and a discussion about habitat condition on adjacent lands be part of the decision-making process with the TCC. This evaluation could be done as part of the annual plan evaluation and review. | 12/10/08 | . Objective 'a' of the Forestland Management Plan specifies that consideration will be given for adjacent land activities. Initial discussion and review of forest plans will be part of the Annual Plan. In addition, the TCC On-site Meeting that is identified in the WHMP includes opportunity for further discussion and review of maps and photos. | PacifiCorp Energy |

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| 12/8/08 | Washington Department of Fish & Wildlife | Chapter 12, Forestland Management - In general, WDFW would like to ensure that timber harvests are not conducted in a required rotation that is based on a small subset of factors. It is more appropriate to propose harvest activities in advance and to plan using a wide range of criteria so that decisions can be made by the TCC. The emphasis must be on enhancing habitat rather on conducting harvest. If it is determined that a harvest is what is needed to enhance habitat, that is when the decision should be made. As it stands now, WDFW interprets the WHMP to be inflexible in when, how or even if it is needed for a harvest to take place. We would like to see less of a set and structured harvest rotation and increased opportunity for detailed analysis of an area before making choices about timber harvests. | 12/10/08 | <p>The rotation ages in the WHMP are listed as approximate and there are more than 15 criteria identified for Timber Harvest Scheduling, Planning and Design. PacifiCorp added the following to the Timber Harvest Options Section of Chapter 12:</p> <p>Forest management is the primary tool for managing habitat characteristics for the enhancement of wildlife cover and forage. Cover and forage are the habitat components that are typically used to describe deer and elk habitat at a Management Unit scale. Cover/forage ratios should be examined to provide a mix of vegetation cover types throughout the Management Unit to minimize energy demands for animals seeking food and shelter. Timber Harvest Areas that are replanted with tree seedlings provide short term (approximately 15 years) enhanced grass/legume/forbs forage and gradually grow towards a more shrub based understory of a conifer stand (or hardwood depending on site characteristics). Because forage is a critical need for deer and elk on WHMP lands, providing a portion of the available forage at a Management Unit level should include some areas of permanent forage (see Forage Seeding section). Forage areas for deer and elk can include predominantly shrub sites or more open grass or meadow sites. The biologists should examine the entire Management Unit and identify the forage components most necessary to meet the desired objectives. In establishing Timber Harvest Areas and in managing for cover:forage ratios it may be desirable to develop permanent forage areas through forest canopy removal and reseedling with a desired grass/legume forage mix. PacifiCorp should identify some options for permanent forage to the Terrestrial Coordination Committee to review in the Annual Plan and then further discuss as part of the On-Site Meeting.</p> | PacifiCorp Energy |
| 12/8/08 | Washington Department of Fish & Wildlife | 12.4.1, Paragraph 2 - This section refers to the removal of salmonberry and alder due to competition with conifer saplings. Salmonberry is a native shrub that provides a moderate level of forage benefit, particularly to avian species, and alders provide some level of forage and has screening capabilities in the spring and summer months. Some removal to bolster survivability of planted conifers does make sense, but complete removal from sites is to be avoided. The standard for removal of salmonberry and alder should be based upon on a cover threshold or should be determined on a site-by-site basis. This will avoid the automatic removal of these species in all areas. | 12/10/08 | <p>PacifiCorp has accepted the change and will incorporate into the WHMP document. The paragraph in section 12.5.9 was changed rather than in Section 12.4.1 because Section 12.4.1 was based on inspections rather than management actions; as follows: During the second year of Timber Harvest Area seedling growth, alder, and Himalayan blackberry will often become established. Where these species interfere with development of establishing conifer tree cover (thermal and hiding) or reduce forage, they should be controlled as necessary to meet the specific wildlife habitat objectives established for the Timber Harvest Area. On mesic sites, salmonberry and wild cucumber can also become established and may require immediate treatment before they overtop young tree seedlings. When appropriate, any herbicide application to improve tree seedling growth should also include recognition of specific species of shrubs that should be retained when not interfering with overall management objectives for establishing thermal cover. Specific procedures for applying herbicides vary with treatment and herbicide.</p> | PacifiCorp Energy |

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| 12/8/08 | Washington Department of Fish & Wildlife | <p>12.4.1, Paragraph 4 – a. This paragraph discusses the maintenance of timber harvest areas for a 15-year period and suggests that the understory in these areas can be maintained for a maximum of 17 years before “<i>conifers must be allowed to develop to provide effective thermal cover</i>”. WDFW recognizes that thermal cover is an important habitat feature, but requests that the option to maintain some of these areas as permanent forage openings should be included in the plan. The need and goal of creating permanent elk forage plots is discussed in several sections of the Standards and Guidelines document, as well as the TERs.</p> <p>b. Currently, several Units within the WHMP “Management Unit” section lists ROWs as permanent forage areas. While these areas do provide forage opportunities for elk, they are disturbed areas under large power lines that often have access roads associated with them. Elk do use these areas, but ROWs that also serve as thoroughfares for local off-road vehicle users and are used by PacifiCorp and their contractors, are not what the Standards and Guidelines document intended as permanent forage areas, particularly when they are planned as one of the few places providing permanent forage opportunities for elk. In addition, the roads established to conduct pre-commercial and commercial thinning activities could fragment habitat (EDAW 2006) and act as barriers to wildlife (Forman et al. 2003). Creation of additional permanent forage plots are mentioned in the <i>Forage Seeding, Tree Seedling Planting</i> section, but these activities need to be specifically called out as Timber Harvest Options.</p> <p>Maintaining cleared timber harvest areas as permanent forage plots, from as small as 1 acre and up to 30 acres, using conifer encroachment removal techniques and seeding with a grass/legume mix, would increase overall forage in a unit while minimizing road and machinery impacts. It would also create a distinct habitat edge effect that elk commonly select as well as meadow habitat for a large number of species. The option to maintain open areas permanently needs to be included in the WHMP.</p> <p>With adequate time for consultation during implementation of the WHMP, we anticipate the potential to site 200 to 250 additional acres of permanent forage in locations distributed throughout the watershed.</p> | 12/10/08 | <p>a. The following was added to Section 12.5 Management Actions – Timber Harvest Options: Because forage is a critical need for deer and elk on WHMP lands, providing a portion of the available forage at a Management Unit level should include some areas of permanent forage (see Forage Seeding section). Forage areas for deer and elk can include predominantly shrub sites or more open grass or meadow sites. The biologists should examine the entire Management Unit and identify the forage components most necessary to meet the desired objectives. In establishing Timber Harvest Areas and in managing for cover:forage ratios it may be desirable to develop permanent forage areas through forest canopy removal and only reseeding with a desired grass/legume forage mix. PacifiCorp should identify some options for permanent forage to the Terrestrial Coordination Committee to review in the Annual Plan and then further discuss as part of the On-Site Meeting.</p> <p>b. No roads are developed for pre-commercial thinning. Roads are minimized to the extent necessary to manage utility assets or the WHMP lands and are gated. Road closures that restrict large scale traffic have been reported to successfully eliminate many of the problems associated with roads to the benefit of ungulates.</p> | PacifiCorp Energy |
| 12/8/08 | Washington Department of Fish & Wildlife | 12.5.1, Forestland Best Management Practices, Forest Roads, Seeps and Springs - Because of the sensitive nature of these areas, attempts to avoid these areas need to be made during road construction. Cross draining and other measures are to be implemented if the impact cannot be feasibly avoided. | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. The following bullet was added: Locate new roads away from seeps and springs where feasible | PacifiCorp Energy |
| 12/8/08 | Washington Department of Fish & Wildlife | 12.5.1, Forestland Best Management Practices, Forest Roads, Streams, Fish Habitat - Any work that is conducted within streams must adhere to the provisions of the Hydraulic permits that will be required for such work. | 12/10/08 | PacifiCorp has accepted the change and will incorporate into the WHMP document. The following bullet was added: Follow Hydraulic Permit Application requirements. | PacifiCorp Energy |

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| 12/8/08 | Washington Department of Fish & Wildlife | 12.5.1, Silvicultural Considerations - WDFW requests the addition of Blacktailed deer to the analysis species in this section. This will add a terrestrial, large range species that utilizes these habitat types. The two species listed are important and should remain in the document, but they are interrelated, as the Flying Squirrel is a prey item of Spotted Owls. The inclusion of blacktailed deer will provide a broader set of criteria for management activities. This will also address the needs of different forage enhancement strategies, primarily (but not limited to) on the south side of Merwin, where Blacktail deer are the dominant ungulate. As Blacktail deer browse on shrubs, only placing grass and legume mixes in these areas does not adequately address the foraging needs of this species. Planting and seeding shrub species in some areas needs to be a part of proposed management. | 12/10/08 | <p>PacifiCorp has added the following: Silvicultural Considerations for the Columbian Black-tailed Deer <i>(Odocoileus hemionus columbianus)</i></p> <p>The black-tailed deer is identified as an “other” species for forestland habitat management. Important characteristics of deer habitat are similar to that for elk but because of the smaller home range of deer (up to 1 square mile [259 ha]), it is important to maintain resources of food, security cover and thermal cover in close proximity. One of the most important considerations for managing deer habitat is a well distributed mix of quality forage and cover. Additionally, riparian areas should be protected to provide travel corridors. Black-tailed deer habitat has been reduced in western Washington due to human encroachment, a reduction in timber harvest, and the natural progression of aging timber stands [succession] (Washington Department of Fish and Wildlife 2008).</p> <p>Best management practices as described in section 12.5.1 identifies criteria for distributing cover and forage on a Management Unit scale and for design of timber harvest areas. Black-tailed deer are often associated with early successional vegetation but is an herbivore that browses a wide variety of woody plants, grazes on grasses and forbs and can be found in all terrestrial habitats. In general, the amount of forage in a deer’s home range should be between 40 and 60 percent (Washington State University Cooperative Extension Service et al. 1998). Deer forage (grass and legumes) is most abundant the first 10-15 years following logging and forage can be enhanced by seeding preferred food plants following timber harvest. Preferred native shrubs include salmonberry (<i>Rubus spectabilis</i>), trailing blackberry (<i>Rubus ursinus</i>) and vine maple (<i>Acer circinatum</i>) and are common within Wildlife Habitat Management Plan lands on the Lewis River. Some of the preferred forbs, grasses and legumes that may do well in Timber Harvest Areas include white clover (<i>Trifolium repens</i>), fireweed (<i>Chamerion angustifolium</i>), and yarrow (<i>Achillea millefolium</i>). Depending on availability and cost these may be introduced in forage seed mixes.</p> | PacifiCorp Energy |
| 12/8/08 | Washington Department of Fish & Wildlife | <p>Management Units - There are some inconsistencies on a Unit-to-Unit basis that WDFW would like some clarification. Several units have similar attributes, cover types and habitat needs that have different proposed cover-forage ratios. Instead of selecting a set management ratio that would automatically trigger the need to harvest an area, we recommend that site conditions and landscape scale considerations be discussed with the TCC so that harvests that are implemented will most benefit the habitat and associated wildlife, rather than reaching a set ratio.</p> <p>WDFW would also like to see additional criteria listed in this section about the selection of management prescriptions. The layout of the current plan only takes into account one factor for guiding activities, which gives the impression that commercial forestry is taking place. The TER specifically lays out what the overriding goal for management is in Section 5.8.5 when it discusses PacifiCorp owned lands:</p> | 12/10/08 | <p>Objective ‘a’ of the Forestland Habitat Management Plan required that a broad range of alternatives be developed for maintaining a mix of cover and forage at the Management Unit level. The different cover;forage ratios are proposed ratios that reflect the difference in Management Units based on available area to manage, northern spotted owl areas of concern, and other wildlife needs. The Forestland Management chapter already identifies that PacifiCorp will submit proposed areas of management as part of the Annual Plan and the TCC has additional opportunity to review the sites on the ground as identified in the WHMP. Additional language was added to Chapter 12 regarding permanent forage areas in several locations:</p> <p>Section 12.5.1 Because forage is a critical need for deer and elk on WHMP lands, providing a portion of the available forage at a Management Unit level should include some areas of permanent forage (see Forage Seeding section). Forage areas for deer and elk can include predominantly shrub sites or more open grass or meadow sites.</p> | PacifiCorp Energy |

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| 12/8/08 | Washington Department of Fish & Wildlife (continued) | <p>Management Units (continued)</p> <p>PacifiCorp Lands – <i>While PacifiCorp might be considered a private industrial forest landowner, its primary management objects is not timber production, but the protection and enhancement of wildlife and terrestrial resources.</i></p> <p>The rotation of harvest solely based upon the cover-forage ratio does not address the standards and guidelines for these areas. The cover-forage ratio is an important tool for deciding when and where timber harvests take place, but it should not be the only driver for management in forested Units. There are other considerations laid out in Section 3.9.4a of the Standards and Guidelines document which states:</p> <p><i>Objective a:</i> <i>At the Management Unit level, provide a range of alternatives for developing and maintaining a mix of forage and hiding cover for elk, considering activities on adjacent lands, over the life of the licenses.</i></p> <p>When the cover-forage ratio for a given unit is proposed to change, conditions on surrounding properties, regardless of ownership, need to be considered before the initiation of management activities. An example of this would be in areas that are adjacent to Pope Resources Properties or near WADNR lands. If a clear-cut or commercial thin occurs in one of these property types that are near a PacifiCorp Management Unit, it could be counterproductive to thin the adjacent PacifiCorp unit for forage. Although the cover-forage ratio may not be at the proposed levels from the WHMP, the need in that area may be for hiding or thermal cover, as there would be accessible forage in the adjacent parcel. To reduce this cover, through any level of thinning, would place adequate hiding cover even further away from forage areas.</p> <p>A more effective way of addressing the overall habitat needs in and around a Management Unit would be to discuss parcels proposed for harvest on an annual basis with the TCC. At the annual meeting, PacifiCorp or any member of the TCC could present what areas they would like to do harvests in and discuss what the conditions are on a landscape level, including a consideration of the existing cover/forage ratio. In order to gain this level of perspective, WDFW suggests using aerial photos in addition to site visits to allow the TCC to develop a bigger picture of conditions in the management unit and surrounding landscape and to best determine the habitat needs for an area, rather than just evaluating an individual management unit. The TCC could then make landscape based decisions on what will be most beneficial from a habitat landscape standpoint. This would still allow PacifiCorp to propose habitat management alternatives 2-3 years in advance, while allowing the TCC to make decisions based on overall conditions.</p> <p>There remains an obvious need for additional forage areas, particularly winter forage, for elk within the Lewis River Basin. The opportunity to create such areas within PacifiCorp managed forests is a large driver for management actions in this chapter of the WHMP, which is consistent with the findings of TER 8 as well as the Standards and Guidelines document for this habitat type. However, the current layout of the Management Units section seems to look at activities based</p> | 12/10/08 | <p>The biologists should examine the entire Management Unit and identify the forage components necessary to meet the desired objectives. In establishing Timber Harvest Areas and in managing for cover:forage ratios it may be desirable to develop permanent forage areas through forest canopy removal and reseedling with a desired grass/legume forage mix. PacifiCorp should identify some options for the Terrestrial Coordinating Committee to review in the Annual Plan and then further discuss as part of the On-Site Meeting.</p> <p>A new bullet was written under Timber Harvest Area Design:</p> <ul style="list-style-type: none">Consider development of permanent forage areas as part of larger Timber Harvest Areas or as separate forage areas through the removal of overstory trees and seeding the area to preferred forage without re-planting trees. The permanent forage areas should be developed in consideration of managing for a minimum of 5 percent of a Management Unit’s manageable acres. <p>Under Forage Seeding the following was added:</p> <p>Once permanent forage areas that are greater than 1.0 acres (0.4 ha) are established as a result of clearing forest vegetation, the sites should then be managed under the goal and objectives established for Farmland, Idle Fields and Meadows Habitat Management Chapter.</p> <p>Page 8-3, Section 8.3. 2nd paragraph, last sentence will be revised. “WHMP lands that are modified to provide permanent forage areas (e.g. Timber harvest areas) that are greater than 1.0 acres (0.4 ha) will be classified as meadows and managed under this section.”</p> | PacifiCorp Energy |

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| 12/8/08 | Washington Department of Fish & Wildlife (continued) | <p>Management Units (continued) on an individual site, specifically the existing and desired cover-forage ratio on the site. There is no mention of conditions in adjacent Management Units or on adjacent properties not in PacifiCorp ownership, or consideration of existing elk use areas. The provided maps in Appendix 12-1 do show vegetation typing for the specific unit, but not what the vegetation type is in surrounding areas. The habitat types on adjacent properties need to be discussed with the TCC before finalizing a harvest prescription. This is consistent with the TER (8) that states:</p> <p><i>Wildlife habitat on PacifiCorp land in the Lewis River Basin is managed at the species, stand, and landscape levels.</i> (Section 5.8.5.1)</p> <p>To standardize the tracking of the cover/forage ratio in harvest planning, we recommend that once a stand is thinned, either in a pre-commercial or commercial thin manner, that stand is considered to be a forage area for at least ten years. Although the thinned stand may be providing some level of screening or thermal cover, the purpose of the thinning operation is to create forage.</p> | 12/10/08 | | PacifiCorp Energy |

Lewis River License Implementation
Lewis River Yale Land Fund
Section 10.1 - 10.1.1

Funding Start Date: 4/1/05

| Release Date | Funds Received | Expense | Interest | Balance | Notes |
|----------------------|-----------------|---------|-----------------|-----------------|--|
| | | | | | |
| | | | | | |
| 12/31/05 | \$ 1,081,853.45 | | | \$ 1,573,922.62 | Contributions in 2003 dollars, adjusted for inflation Fixed prime rate nearest April 1 of each year |
| 4/30/06 | | | | | |
| 12/31/06 | | | \$ 90,500.56 | \$ 2,746,276.63 | |
| 12/31/07 | | | \$ 212,836.46 | \$ 2,959,113.09 | |
| 3/31/08 | | | \$ 244,629.38 | \$ 3,203,742.47 | |
| Total Spent to Date: | | | \$ - | | |
| Running Total: | | | \$ 3,203,742.47 | | |

Lewis River License Implementation

Lewis River LWD Fund

Section 7.1.1

Funding Start Date: 12/26/08

| Release Date | Expense | | Balance | Notes |
|----------------------|-------------|--------------|--------------|--|
| | | | | Unspent balance in any year shall be carried forward |
| 11/25/08 | | | \$ 2,000.00 | 7.1 Large Woody Debris Program, ILR-LWD |
| 11/25/08 | | | \$ 10,000.00 | |
| 12/3/08 | \$ 2,000.00 | | \$ 10,000.00 | Chilton Logging - move LWD from Swift boat launch to muddy river access road |
| Total Spent to Date: | | \$ 2,000.00 | | |
| Running Total: | | \$ 10,000.00 | | |

Lewis River License Implementation
Lewis River WHMP Fund (Fee Simple Lands)
Section 10.8.2

Funding Start Date: 12/26/08

| Release Date | Funds Received | Expense | Balance | Notes |
|-----------------------------|----------------|----------------------|---------------|---|
| | | | | Contributions in 2003 dollars, Adjusted for Inflation |
| 12/26/08 | \$ 313,398.68 | \$ 205.51 | \$ 313,604.19 | 10.8.2 WHMP Fund (10,085 acres \$27.00 lands owned in fee simple = \$272,295.00) |
| Total Spent to Date: | | \$ - | | |
| Running Total: | | \$ 313,604.19 | | |