

DRAFT CULTURAL RESOURCES STUDY PLAN

Blue Lake Hydroelectric Project (FERC No. 2230) Expansion

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INTRODUCTION

This Draft Cultural Resources Study Plan describes proposed studies related to the Blue Lake hydroelectric project ((“Project”, Federal Energy Regulatory Commission (FERC) No. 2230)) Expansion. The Project is owned by the City and Borough of Sitka, Alaska, and operated by the City and Borough of Sitka Electric Department (collectively, the “City”).

The City is in the process of applying for an amendment to the Project’s existing FERC license to reflect two significant changes in Project design: 1) addition of a third generating turbine at or near the existing powerhouse and 2) raising the Project dam as much as 83 feet from the existing spillway height of El 342 to El 425. The City is exploring feasibility of these changes because of recent electric load forecasts in the face on increasing diesel fuel costs. Details of elements of the proposed expansion are described in the Initial Consultation Document (ICD) which was distributed to you early in the license amendment process.

These cultural resource surveys will be used by the FERC and state and federal resource agencies to help evaluate impacts of the Expansion-related actions prior to issuing the Expansion-related license amendment.

BACKGROUND

The City recently received a new 30-year operating license for the Project. This license was issued after an extensive relicensing process during which the City conducted studies to document existing environment and potential impacts of continued Project operation. Cultural resources studies for the relicensing were conducted by a third-party contractor and documented in draft and final reports. Because the relicensing proposal did not include significant changes in either the Project design or operation, projected impacts were considered insignificant.

The proposed Expansion would result in significant physical change, primarily related to inundation of areas around Blue Lake due to dam raising, and to building and use of access roads and construction of a new powerhouse. This study plan seeks to address these additional effects in addition to analyses done for relicensing.

PROPOSED CULTURAL RESOURCES STUDIES

GENERAL

In general, the City proposes to survey potentially-affected cultural and historical resources within an Area of Potential Effect (APE) to provide a baseline on which to evaluate Expansion-related impacts.

Blue Lake Project cultural resource studies will be comprised of two primary efforts, 1) Literature and Information Review and 2) Field Studies, as described in detail below. Both the Literature Review and Field Studies for the Expansion will utilize data and information collected during the relicensing studies. Expansion-related studies, however, will be considered “stand-alone” and will be designed and executed to fully address the current Expansion proposals.

The City proposes to hire a qualified cultural resources contractor to conduct both the literature review and field studies phases. The contractor’s resume will be made available to consulting agencies for review and approval prior to contracting.

DETERMINATION of APE

Before either of the two main tasks are begun, the contractor, in association with City and Expansion Project Stakeholders will determine an Area of Potential Effect (APE) relative to all proposed land disturbances or access effects. APE determinations around Blue Lake will be done relative to inundation area of the maximum proposed dam height, or El 425. The APE perimeter will generally, but not absolutely, delineate the boundaries of field studies.

LITERATURE AND INFORMATION REVIEW

Literature Review

The cultural contractor conducted extensive literature review for the relicensing, which will be made available to the Expansion contractor. Additional literature, however, will be sought which addresses potentially inundated or otherwise disturbed areas related to the Expansion proposal.

The City, through its cultural resources contractor, will research available cultural and historical resources literature, including, but not limited to:

- Site/survey atlas records
- Mining history

- A report by Rabich-Campbell, 1989
- Surveys conducted for the Project relicensing.

Most of the relevant available literature resides at the USFS Sitka Ranger District Office in Sitka AK. The cultural resources contractor will also search other sources, including academic and resource agency libraries and files and Sitka Tribe of Alaska (STA) records as appropriate.

Interviews with STA representatives.

Interviews with STA were conducted for the relicensing studies. However, these interviews may have focused on existing Project areas, since there were no proposals to expand the Project's footprint.

The cultural resources contractor and selected City representatives may interview STA members to determine the existence of any tribally-significant sites or artifacts within the new APE, including potentially-inundated areas around Blue Lake and areas within the APE near the proposed powerhouse changes.

Confidentiality of the information will be given the utmost consideration and the interview(s) will be documented in the manner approved by STA.

Decision-Making Based on Literature and Information Review

A brief report of results of the literature and information review will be compiled by the cultural resources contractor and the City and distributed for resource agency and STA review. Comments on literature findings will be considered when planning field studies described below.

FIELD STUDIES

Within the APE, field studies will be conducted at different levels of intensity, depending on elevation and specific location. Generally, studies will be broken into two primary areas, below and above the Project dam.

Below the Dam Studies

The area below the Project dam was most intensively studied during relicensing, but will be surveyed again with emphasis on areas which might be disturbed by access to and construction of the new powerhouse. Relicensing-related study planning indicated that most Native American resources would be found below approximately El 100, suggesting more detailed surveys in areas within the APE below that elevation.

Below the dam, the contractor will have access to detailed topographic information to be used in the new powerhouse and access designs. All surveys in this area will be

referenced to the available map-based material and GPS information. The contractor will note all survey locations on the maps according to date and time of the surveys.

Above the Dam Studies

Above the Project dam, detailed map materials will be available for the area immediately around the existing dam and intake, which will be used in the same way as these materials will be used in studies below the dam. Potentially-inundated areas have been mapped using LIDAR, but not to the resolution available for the powerhouse and intake areas. Surveys in the potentially-inundated areas will be referenced to map or drawing locations using GPS.

The cultural report for relicensing documented the historic mining activities near Blue Lake Creek, Blue Lake's primary inflow source. Surveys in the Blue Lake Creek inundation area will extend observations of these mining activities upstream as far as inundation to El 425 will extend.

Field Surveys

Field surveys will proceed in two phases: Phase I, reconnaissance survey to generally evaluate sub areas within the APE in terms of the likelihood or actual existence of historical or cultural properties; and Phase II, more detailed studies, including excavations if necessary, to document locations of use sites or areas of high likelihood.

Phase I

In the first or reconnaissance phase, the cultural resource contractor will conduct a general survey within the APE with emphasis on areas to be disturbed by construction or inundation. Within these sites, the contractor will note physical factors such as slope, aspect, gradient, vegetation, and others as appropriate. Also within the various survey sites, the contractor will note existing evidence of cultural or historical artifacts.

Based on these initial surveys, the contractor will prepare a site evaluation report with map-based notations of the likelihood of finding cultural or historical properties within the various sub-areas of within the APE. The Phase I report will make recommendations on the need for more detailed surveys and excavations to be conducted in Phase II. The Phase I report will be reviewed by consulting agencies and STA, and comments incorporated into the Phase II survey protocol, described below.

Phase II

In Phase II surveys, the contractor will implement the survey protocol from the Phase I report. The survey protocol will specify the locations of excavations or detailed visual surveys and methods to be used. Excavation and observation methods may be refined in the field based on conditions encountered. If terrain or vegetation significantly affects

proposed methods, the contractor will notify reviewing agencies via email of the reasons that an approved method or location may not be feasible. Phase II surveys will be documented in draft and final reports with appropriate map-based material and descriptive text.

REPORTING

The City and its cultural resources contractor will prepare a draft report documenting both the literature review and Phase I and Phase II field survey components of the study. The report will be organized in traditional technical report format, including Introduction, Materials and Methods, Results and Discussion. Final report format and organization will be reviewed by the consulting parties.

STUDY AND REPORT SCHEDULE

The cultural resources studies should commence in late summer, 2008 with the objective of completing Phase II field surveys before weather limits access to areas above Blue Lake. Emphasis will be placed on completing the Blue Lake Creek and other tributary surveys earliest, because other areas near the intake site and proposed powerhouse sites will be easier to access if weather deteriorates.

The draft Phase I report should be available in late summer, 2008, and the final Phase I report, with the approved Phase II study plan, available by mid-September. Phase II surveys in Blue Lake tributary areas should be complete by mid-October.

If further surveys are required, the effort may continue in 2009, recognizing that weather and access may preclude further surveys until summer of that year.

All Draft Cultural Resources Reports will be submitted for review by USFS, SHPO and STA and other stakeholders, as appropriate.