



File Code: 2770
Date: July 31, 2012

Christopher Brewton
Utility Director
City & Borough of Sitka
105 Jarvis Street
Sitka, AK 99835

Dear Mr. Brewton:

We reviewed the *Amended Final Reservoir Inundation Plan, Blue Lake Hydroelectric Project (FERC No. 2230) Expansion* prepared by the City June, 2012. Based on this review we offer the following comments:

General: This plan does not address proposed erosion control and water quality protection relative to clearing, collecting, and removing or burning a small amount of timber in the areas to be inundated prior to dam raise for creating a burn area and for limited access to high quality timber for traditional cultural use. This will need to be addressed in the *Erosion and Sediment Control Plan*, in which it currently is not.

PRIMARY ENVIRONMENTAL EFFECTS: This plan does not state whether the plan to collect, burn, and bury will prevent concentrations of THC in excess of city drinking water standards.

The figures are not correctly numbered. If Drawing 108-06-001 is figure 2 and Drawing 109-06-002 is figure 3, then the TUFFBOOM figure is figure 4, and so forth.

The plan needs a section to address limited utilization of timber from inundation area. This section should address:

- Development of the burn corridor and burn area and how water quality will be maintained.
- Recovery of limited amount of suitable wood on a one-time basis for use by local carvers for traditional cultural uses.
- The City has determined to consider the option of recovering firewood but not to consider recovery for merchantable timber. This is based on the widely different timber settlement values if sale of merchantable timber had to be considered.
- Removal and use of free-floating wood for removal and use as firewood after commissioning of the new intake.



OTHER ENVIRONMENTAL EFFECTS: Will subsistence users and recreationists be able to get past the floating debris booms?

If you have questions, please contact Clay Davis at (907) 747-4225 or email clayrdavis@fs.fed.us.

Sincerely,

CAROL A. GOULARTE
District Ranger