



United States  
Department of  
Agriculture

Forest  
Service

Alaska Region  
Tongass National Forest  
Sitka Ranger District

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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 *Final Sediment and Erosion Control Plan, Blue Lake Hydroelectric Project (FERC No. 2230) Expansion*, prepared by the City in May, 2011. Based on this review, we offer the following comments:

Title: Throughout the Environmental Assessment process, are references to an *Erosion Control Plan*, an *Erosion & Sediment Control Plan*, and this document titled *Sediment & Erosion Control Plan*. We suggest you use the plan name ***Erosion & Sediment Control Plan*** and identify this plan as meeting the 4e Condition No. 22.

**1.0 INTRODUCTION:** In the third paragraph, the City refers to timber clearing which is no longer being considered. We suggest you address proposed erosion control and water quality protection relative to clearing, collecting, and removing a very small amount of timber in the areas to be inundated by the dam raise in this document and the *Water Quality Monitoring Plan*.

Add: **1.1 NEED FOR THIS PLAN** This *Erosion and Sediment Control Plan* has been developed to satisfy License Article 405 4e Condition No. 22 and Article 407 in amendment order issued 5/31/2012.

Condition No. 22 states: (language of condition).

**3.2 PROPOSED CONSTRUCTION SCHEDULE:** Update schedule.

**4.0 SCOPE of SEDIMENT and EROSION CONTROL ACTIONS:** Where is the proposed addendum to the plan presenting the specifics of control measures?

**4.1.1 On- or Near-Site Retention and Redistribution:** When are the exact removal and storage sites going to be identified?

**4.1.3 Sawmill Creek Industrial Park (SCIP) Spoils Disposal and Processing Area:** In the second paragraph change the reference from *Weed Risk Assessment* to the 4e Condition No. 21 – *Noxious Weed Management Plan*.

What is the answer regarding the site being covered by a National Pollutant Discharge Elimination System (NPDES) permit?



**4.2 BEST MANAGEMENT PRACTICES:** In the first paragraph, the old Handbook is still being referenced. The effective date should be July 14, 2006. Did the City receive the new edition as offered in the earlier review?

In the first bulleted comment, this paragraph should reference the *Revegetation Plan*.

In the sixth bullet, have detailed monitoring methods to measure the effectiveness of erosion and sediment control measures been described in the *Construction Water Quality Monitoring Plan*?

In the seventh bullet, the City still does not explain what the control measures will be for disturbances occurring from September through winter.

**Figure 2:** All figures after and including figure 2 need to be identified by figure number.

**Figure 3:** The 0.5 acres to be revegetated are not labeled as such or identified in a figure note.

**5.3.2 Erosion and Sediment Control:** USFS will perform an inspection of the dam site power distribution line construction area this summer to evaluate the effectiveness of the City's control measures.

General: Overall, this is not a final plan. Most of the details have been put off to be addressed at a later date. The City now desires to be permitted in September to begin construction in November. Later has arrived.

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

Sincerely,

CAROL A. GOULARTE  
District Ranger