



File Code: 1950

Date: May 18, 2012

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

Dear Mr. Brewton:

We reviewed the *Draft Noxious Weed (Invasive Plant Species) Management Plan, Blue Lake Hydroelectric Project (FERC No. 2230) Expansion*, prepared by City & Borough of Sitka Electric Department on April, 2012. Based on this review, we offer the following comments:

The draft plan does a good job of summarizing the potential invasive species problems in the project area. However, it would be difficult to translate this plan into a contract and it is hard to understand exactly what is being proposed, especially in terms of controlling the existing priority invasive species. There is also a need to clarify what control measures are planned for the lower priority weeds. The suggested control methods are biased against chemical methods, which may not be in the best interests of the City, the Forest Service, or potential contractors. A fairly intensive monitoring program is recommended during and after the project. This is appropriate and could be turned into a schedule for monitoring.

We recommend the following steps:

1. Create a list of priority species for the project, and a rationale for adding new invasive species to the priority list if they are found.
2. Prior to construction, locate, flag, and map priority weed populations.
3. Identify priority control or eradication sites based on risk of spread, and define treatment or control options and recommended timing.
4. Create a list of low priority species and a rationale for tolerance of these species in the project area or a threshold for non-tolerance.
5. Discuss project areas where control options are limited (e.g. cliffs).

To better assess the risk of this project spreading or introducing invasive species and how to address that risk, more information is needed.

1. How many acres will be disturbed during construction?
2. How much rock, sand, and other fill or construction material will be needed and where will it come from? Will the quarried material come from a weed-free source?
3. Where will the overburden be stored and covered, and has that site been inspected for weeds?



4. Who will be responsible for implementing and monitoring this management plan?
5. Will all equipment be cleaned prior to working on this project?

References: The Forest Service Manual, FSM 2000 – National Forest Resource Management Handbook; Chapter 2080 – Noxious Weed Management, cited in this report was replaced on December 5, 2011 by the following new manual which sets forth National Forest System policy, responsibilities, and direction for the prevention, detection, control, and restoration of effects from aquatic and terrestrial invasive species (including vertebrates, invertebrates, plants, and pathogens).

FSM 2900—Invasive Species Management, Chapter – Zero Code

Introduction: On page 3, third paragraph, replace “*Elimination and Monitoring*” with “*Management*”.

Management Efforts Studied Elsewhere: On page 10, this paragraph mentions personal observations of control techniques currently being used in the Stikine Wilderness area. While these strategies are commonly used, there is no data given to support this recommendation. The tarping technique shown in figure 3, and mentioned elsewhere as a control method, would have the same drawback of “*non specificity for targeted species*” that was mentioned as a reason for not using chemical controls.

Treatment and Monitoring: On page 11, more clarification is needed about where monitoring and treatment is proposed and which invasive species are to be treated. The general use of “*work zones*” and “*Blue Lake Road*” as monitoring and treatment areas for all invasive species is much too vague. Some of the invasive species in the project area may be beyond any reasonable means of control in the project area and shouldn’t be the focus of extensive control effort, although should be considered in terms of moving overburden into the storage area. These species should be identified as common and not the focus of control. The highly invasive species that are the focus of control and eradication should be mapped and prioritized for the control work.

On page 12, first paragraph, “*Chemical treatment is not recommended for treatment of the invasive species in the project area for the following reasons:*” while the known populations of invasive species may not warrant pesticide treatments, there is no reason for the City to recommend limiting its own control options. An integrated invasive species management plan generally includes the consideration of all cost effective treatment options.

On page 12, last paragraph, “*Further actions recommended for preventing the introduction and/or spread of invasive species include:*” all of the recommended mitigation and prevention strategies for this project should be listed together in a separate section. Vehicle washing should be specified and required in the construction contract.

Habitat Vulnerability and Non-Project Weed Vectors: On page 12, this section has a good discussion of the existing weed vectors for the project area. It should be followed with another section discussing project specific weed vectors such as all the equipment use, sources of rock and sand, project related disturbance, overburden storage, and erosion control materials used.

Post-Construction Monitoring: On page 13, add “*and Control*” to this section title. Clarify

which invasive species will be controlled and where.

Reconstruction of the Sawmill Creek Campground will occur at the end of construction and should be considered as part of the project. This plan should also encompass the campground part of the project.

Sincerely,

/s/ Carol A. Goularte
CAROL A. GOULARTE
District Ranger

