



**File Code:** 2770

**Date:** August 9, 2012

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

Dear Mr. Brewton:

We reviewed the *Draft Water Quality Monitoring Plan, Blue Lake Hydroelectric Project (FERC No. 2230) Expansion*, prepared by the City & Borough of Sitka Electric Department, June 2012. Based on this review, we offer the following comments:

In February when we reviewed the FERC EA, we commented on the lack of information in this plan. The plan lacks the required details for review.

**Article 409.** *Construction Water Quality Monitoring Plan. At least 60 days prior to ground disturbing activities, the licensee shall file with the Commission, for approval, a Construction Water Quality Monitoring Plan.*

*The plan shall identify at a minimum:*

*(1) Exact locations of monitoring sites; (2) water quality parameters to be monitored including but not limited to turbidity and total organic carbon; (3) a frequency of monitoring during all phases of construction which shall be at least daily; and (4) specific measures to be taken in the event that monitoring identifies unacceptable water quality conditions*

**Article 410.** *Long-Term Water Quality Monitoring Plan. At least 60 days prior to ground disturbing activities, the licensee shall file with the Commission, for approval, a Long-Term Water Quality Monitoring Plan.*

*The plan shall include at a minimum:*

*(1) identification of all long-term water quality monitoring sites including Blue Lake, the powerhouses, and Sawmill Creek; (2) the specific water quality parameters to be monitored at each site, including but not limited to turbidity and total organic carbon; (3) the frequency of monitoring at each location which shall be at least weekly as well as the duration of monitoring during the term of the license; and (4) identification of specific measures to be taken in the event that monitoring indicates problems with water quality at the project.*

Both Article 409 and 410 identify those items that will be included at a minimum. We recommend re-organizing the plan to follow the headings implied by the Articles (two kinds of plans, each one with a minimum of four types of information). We would further recommend that both plans include objectives and quality assurance.

**NEED for WATER QUALITY MONITORING** – In the second paragraph there is reference to increases in certain contaminant concentrations. These plans are the documents where specific details need to be addressed. What are the contaminants, and how are the four minimum types of information both during construction and long-term going to be addressed?

**CONSTRUCTION PERIOD MONITORING** – There is a bulleted list *emphasizing detection of a*



variety of construction effects; however, there are no parameters of what and how to monitor. The next to last paragraph: *Water samples will be collected at various intervals depending on schedule and proximity to active construction sites. In all these areas, water quality sampling will be conducted at locations and time intervals agreed to after determination of both construction methods and the construction schedule. After these milestones are reached, the City will, prior to any ground disturbance, complete a detailed Construction-Related Water Quality Monitoring Plan documenting exact locations, constituents, methods and frequency of construction-related sampling. A draft of the plan will be reviewed and commented on by the appropriate state and federal resource agencies, and all comments will be addressed in the final plan which will be distributed to agencies required by FERC.*- makes it evident that this document is not ready for review because it does not meet the requirements of Article 409.

**LONG-TERM OPERATION MONITORING** – Aside from general trends and effects, are there long-term objectives related to specific concerns, mitigations, project design, etc., that are being monitored?

***Monitoring of Other Water Quality Parameters in Blue Lake***

In the first paragraph, the City identifies two approximate sampling points. Why were these sites chosen?

There is a bulleted list of constituents sampled. What is the basis for each of these parameters? What are you trying to detect?

The last paragraph states: *Exact constituents, sampling protocols and measurement methods will be determined based on agency comment and review of equipment and methods available at the time of the onset of monitoring.* When will this comment and review occur?

***Monitoring of Other Water Quality Parameters*** – this section raises the same questions as above.

***Water Quality Monitoring at the City's Water Treatment Plant and Fish valve Unit*** – The final paragraph addresses monitoring for blast residue. This information belongs in the Construction Period Monitoring section.

***Specific Measures if Monitoring Identifies Unacceptable Water Quality Conditions*** – What specifically constitutes unacceptable water quality conditions? Will you be using numeric water quality criteria (e.g. Alaska DEC, EPA)? What measures will be taken in response to results for parameters other than turbidity (e.g. mercury, TOC, manganese). There should be a threshold and response for every constituent identified in these two plans. These constituents should be identified based on reporting requirements (from some regulatory agency) or for a well-defined study based on some of the effects identified in the FERC EA (e.g. effects from inundation plan to flood 362 acres of extensive coniferous and deciduous vegetation, potential effects to anadromous and resident fish).

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

Sincerely,

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