

**From:** Hanley, Kevin J (DEC) [kevin.hanley@alaska.gov]  
**Sent:** Monday, January 24, 2011 8:13 AM  
**To:** deano@cityofsitka.com  
**Cc:** chrisb@cityofsitka.com; Bohan, Carrie D (DNR); cgoularte@fs.fed.us; Richard Enriquez; campbell@cityofsitka.com; Prokosch, Gary J (DNR); susan.walker@noaa.gov; andrew@sitkawild.org; Miller, Christopher C (DEC); Fogue, Scott A (DEC); Bulkow, Susan J (DEC); Kastens, Kathaleen (DEC)  
**Subject:** FW: Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

Dean, I don't know what the timelines are for the review of this project, but here are the DEC Drinking Water Program's comments for your consideration.

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**From:** Miller, Christopher C (DEC)  
**Sent:** Friday, January 21, 2011 1:04 PM  
**To:** Hanley, Kevin J (DEC)  
**Cc:** Fogue, Scott A (DEC); Bulkow, Susan J (DEC); Kastens, Kathaleen (DEC)  
**Subject:** RE: Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

Kevin,

I'm following up on the concerns you expressed on the proposed Timber Removal and Management Plan, Blue Lake Hydro Project. I have talked this over with the Drinking Water Program staff, and have the following comments regarding the harvesting of timber along the shoreline of Blue Lake:

Sitka is a water system that is approved to operate without filtration; they are been required to have a Watershed Control Program that controls microbial contamination to their water source (Blue Lake). They are also required to meet very strict water turbidity standards. It is unknown if harvesting along the shoreline could result in an increase in microbial contamination or elevated turbidity (due to increased runoff). However, if water degradation does occur, Sitka could lose their approval to operate the water treatment plant without filtration. Upgrades to a water treatment plant to include filtration can be very expensive.

In addition, it appears that the City of Sitka currently has an ordinance in place that prevents such events from occurring within the Blue Lake Watershed. Harvesting timber within the Blue Lake Watershed would likely require an amendment to this ordinance.

***Sitka Ordinance: 15.02.070 Removal of Soil, Trees, or Plants***

*No person in the watershed shall dig or remove any sand, whether submersed or not, or any soil, stones, trees, shrubs, or plants, downed timber or wood, or materials, or make any excavation by tool equipment, blasting, or other means or agency.*

As I've mentioned before, the Drinking Water Program does not have authority to restrict this project from occurring but if they choose to proceed with harvesting the shoreline timber, they need to be aware of all the impacts it may have on the system. If they choose to proceed with harvesting, the system may want to switch to an alternative water source, but their emergency backup source is not approved for regular operations due to having inadequate water treatment. . Switching to this emergency backup source would result in the Sitka being placed on a boil water notice, which from my understanding is not a highly desirable outcome for a city strongly dependent on tourism.

It's worth noting that the City of Kodiak recently completed a similar project on their public drinking water source and

they decided to leave the timber in place. There were some noted increased Disinfection Byproducts due to added organics but the levels soon stabilized and did not become a compliance issue. Given all the possible outcomes of harvesting the timber, it may be in the best interest of the City of Sitka to leave the timber untouched.

Thank you for bringing this to our attention. Specific questions regarding treatment and/or sampling requirements for the water system can be directed to Scott Forgue or Susan Bulkow at (907)262-5210.

Chris Miller  
Coordinator  
Public Drinking Water Protection  
State of Alaska  
DEC/EH/DW  
Ph: 907-269-7549  
Fax: 907-269-3990  
[chris.miller@alaska.gov](mailto:chris.miller@alaska.gov)

 Please consider the environment before printing this email.

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**From:** Hanley, Kevin J (DEC)  
**Sent:** Tuesday, November 23, 2010 3:41 PM  
**To:** Moselle, Kyle W (DFG); Nudelman, Joel L (DNR)  
**Cc:** Kanouse, Kate M (DFG); Miller, Christopher C (DEC)  
**Subject:** FW: Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

Thanks Kyle, after looking at this, my initial thoughts are that they can either leave the trees in place and let the rising water level claim them, or they can yard the felled timber out of the area via helicopter, recognizing that an estimated 4.7 MMBF of the total 8.5 MMBF volume is sawlogs (merchantable) and the remaining 783 MBF is utility (nonmerchantable). I didn't see any justification in the document as to why they need to harvest the trees, but I assume it's because they want the dollar value for them (the sawlogs), as well as wanting to provide a source of firewood (the utility logs) for the community. If they simply want to raise the level of the reservoir for hydropower generation purposes, then I don't see why they need to remove the trees. From a water quality standpoint, I'd be more concerned about the potential for generating sediment/turbidity by the logging and burial of the burned slash, as well as the construction of "minimal roads" at the east end of the lake within the area to be inundated, than I would with just raising the water level and inundating the forest or letting the felled and bucked logs float for collection. In addition, they plan on using a barge to transport the logging shovels and, I assume, some type of boom boat to develop log rafts and retrieve them. This presents a concern for the introduction of petroleum hydrocarbons into this drinking water source. I'll pass this along to our Drinking Water program folks to see if they have any concerns with this.

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**From:** Moselle, Kyle W (DFG)  
**Sent:** Tuesday, November 23, 2010 2:52 PM  
**To:** Hanley, Kevin J (DEC); Nudelman, Joel L (DNR)  
**Cc:** Kanouse, Kate M (DFG)  
**Subject:** FW: Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

Kevin and Joel,

Kate forwarded me the attached timber removal plan for a proposed FERC project in Sitka (increasing the height of the Blue Lake dam). She is the lead on this project for Habitat, but has asked me to chase down some of the issues related to the timber component of the over-all project.

Kevin, do you see any red flags related to water quality from falling and bucking the trees around blue lake and then floating them when the lake level rises? Blue lake provides a portion of Sitka's drinking water supply.

Joel, I don't think FRPA BMPs for timber harvesting apply because this will be a land conversion, but I wanted to run the proposal by you as well because it is in your area. Any red flags?

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Take care,  
Kyle Moselle  
Tongass Coordinator  
ADF&G, Division of Habitat  
Office: 907-465-4287  
Fax: 907-465-4759

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**From:** Kanouse, Kate M (DFG)  
**Sent:** Wednesday, November 17, 2010 2:40 PM  
**To:** Moselle, Kyle W (DFG)  
**Subject:** FW: Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

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**From:** Dean Orbison [<mailto:deano@cityofsitka.com>]  
**Sent:** Wednesday, October 27, 2010 4:25 PM  
**To:** Andrew Thoms; Mark Buggins; Melissa Dinsmore; Carole Goularte; Johnson, Shawn L (DFG); Richard Enriquez; [jfeldpausch@sitkatribes.org](mailto:jfeldpausch@sitkatribes.org); Mooney, Philip W (DFG); Tydingco, Troy A (DFG); Susan Walker; Kanouse, Kate M (DFG); Prokosch, Gary J (DNR); Groom, William M (DNR); Barbara Stanley; Miller, Monte D (DFG); [campbell@cityofsitka.com](mailto:campbell@cityofsitka.com); Speerstra, Linda POA; Bohan, Carrie D (DNR); Christopher A Leeseberg  
**Cc:** Charles Mike Prewitt; Christopher Brewton; Jessica Stockel  
**Subject:** Draft Timber Removal and Management Plan, Blue Lake Hydro Project (FERC No. 2230) Expansion

Distribution,

Please find attach the Draft Timber Removal and Management Plan for the Blue Lake Project Expansion.

The City will explain this draft plan at the meeting on plans and mitigation proposals scheduled for Nov. 5 at the Electric Department.

Please contact me by e-mail or 907-747-1827 if you have any questions.

Thanks for your continued participation in the Blue Lake Project Expansion.

Dean

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**From:** Dean Orbison [<mailto:deano@cityofsitka.com>]  
**Sent:** Tuesday, October 26, 2010 2:28 PM  
**To:** Andrew Thoms ([andrew@sitkawild.org](mailto:andrew@sitkawild.org)); Mark Buggins ; Melissa Dinsmore ([mdinsmore@fs.fed.us](mailto:mdinsmore@fs.fed.us)); Carole Goularte ([cgoularte@fs.fed.us](mailto:cgoularte@fs.fed.us)); Shawn Johnson ([shawn.johnson@alaska.gov](mailto:shawn.johnson@alaska.gov)); Richard Enriquez ([Richard\\_Enriquez@fws.gov](mailto:Richard_Enriquez@fws.gov)); ([jfeldpausch@sitkatribes.org](mailto:jfeldpausch@sitkatribes.org)); Phil Mooney ([phil.mooney@alaska.gov](mailto:phil.mooney@alaska.gov)); Troy Tydingco ([troy.tydingco@alaska.gov](mailto:troy.tydingco@alaska.gov)); Susan Walker ([susan.walker@noaa.gov](mailto:susan.walker@noaa.gov)); Perry Edwards ([pedwards@fs.fed.us](mailto:pedwards@fs.fed.us)); [kate.kanouse@alaska.gov](mailto:kate.kanouse@alaska.gov); Gary Prokosch ([gary.prokosch@alaska.gov](mailto:gary.prokosch@alaska.gov)); Groom, William M (DNR); Barbara Stanley ([bstanley@fs.fed.us](mailto:bstanley@fs.fed.us)); Miller, Monte D (DFG); Marlene Campbell ([campbell@cityofsitka.com](mailto:campbell@cityofsitka.com)); Speerstra, Linda POA; Carrie Bohan ([carrie.bohan@alaska.gov](mailto:carrie.bohan@alaska.gov))  
**Cc:** Charles Mike Prewitt; Christopher Brewton ([chrisb@cityofsitka.com](mailto:chrisb@cityofsitka.com)); Jessica Stockel  
**Subject:** Meeting on plans, mitigation proposals, Blue Lake Hydro Project (FERC No. 2230) Expansion

The City and Borough of Sitka Electric Department (City) requests your attendance at the subject meeting, to be held on Friday, November 5, 2010. The meeting will be held at the Electric Department Offices, 105 Jarvis Street in Sitka

at 1:30 PM.

Topics of the meeting will include:

- A short discussion on the final license amendment application;
- The City's proposals for: 1) mitigation measures for the 430 acres of land potentially-inundated by raising the existing Blue Lake dam; and 2) a proposed reservoir access plan;
- A Draft Erosion and Sediment Control Plan;
- A Draft Timber Removal and Management Plan; and
- The City's proposed water quality monitoring plans for the timber removal.

Please send any additional agenda items at your earliest convenience.

If you would like to attend by phone please let me know, we will notify you of the call in number.

If you have other questions or comments, don't hesitate to contact me at 907-747-1827, or via email.

Thanks for your continued participation in the Blue Lake Project Expansion.

Dean.