



File Code: 2770-2

Date: September 8, 2008

Charlie Walls
Utility Director
City and Borough of Sitka - Electric Department
105 Jarvis Street
Sitka, AK 99835

RE: Blue Lake Hydroelectric Project (FERC No. 2230) License Amendment, USDA Forest Service, Tongass National Forest, Sitka Ranger District, Action Item follow up from August 15, 2008 meeting minutes

Dear Mr. Walls:

I offer the following responses to action items in the Final Meeting Minutes of August 15, 2008. Comments are organized by Page and Section, as presented in the minutes.

Page 3, Threatened and Endangered Species,

Action: City to gather information to prepare a BE

Examples of a Biological Evaluations will be provided electronically to Mr. Dean Orbison, City Electrical Department.

Page 4, Document spawning and juvenile rearing habitat...

Action: Contact Ken Coffin to request modification of the study request language

The sampling methods following the phrase "such as" were examples of ways to conduct surveys: it was not intended to be direction that must be followed, just ideas. The current fisheries survey study plan is sufficient.

Page 4, Monitor flow and temperature for Blue Lake tributaries...

Action: Measure discharge at good cross-sections on the days of habitat measurement.

Modify habitat study plan to show discharge measurement.

It is our understanding that hobotemp hydrothermographs are collecting temperature data on tributaries. The collection of spot flow measurements (CFS) will be sufficient. We recommend collecting flow data during base flows for all tributaries in order to have some comparison between streams vs. base flows in one stream, medium flow in other stream, etc.

Page 4 -5, Determine the quantity of Blue Lake rainbow trout annually entrained...

Action: City to prepare a position paper to be reviewed by USFS

Troy Tydingco, fish biologist with Alaska Department of Fish & Game, shared that trapping studies around the reservoir found less than four percent of fish at 90 feet in depth. The current intake is deeper than that and the proposed dam raise will make the inlet depth even deeper. Based on this information, I see no reason to conduct entrainment studies.



Page 5, Conduct a Biological Evaluation (BE) ...

Action: Perry said he would read the City's wildlife study plan and communicate with Kent and Ken Coffin on the adequacy of his ongoing studies.

We concur with the City's statements on dens and nests with the following exceptions for addressing avian wildlife. Bald eagle nest surveys shall be performed. They can be performed by visual observation while on a boat in the reservoir and by helicopter when conducting mountain goat surveys.

Goshawk nest surveys shall be completed to cover 100 percent of the inundation area and 600 feet beyond the maximum inundation area. This is commensurate with nest surveys that would be conducted for timber sales (and all trees will be cut in area of inundation). We recommend use of the Sitka Ranger District 2008 Draft Forest Service survey protocol.

The 2008 Tongass Land and Resource Management Plan (pages 4-92 through 4-100) lists Threatened/Endangered/Sensitive species and Management Indicator Species (MIS) which include brown bear, deer, seabird rookeries, waterfowl and shorebird habitats, heron and raptor nests, mountain goat, marbled murrelet, marten and small terrestrial mammals. We believe all these can be picked up through existing field survey design for habitat and incidental sightings or scat/tracks, browse, bird songs, etc. The key is documenting it and then listing it in the NEPA document, i.e. where is the habitat? is it occupied by species x?

Page 6-7, Identify migratory waterfowl species and sea birds.....

Action: As above, Perry said he would read the City's wildlife study plan and communicate with Kent and Ken Coffin on the adequacy of his ongoing studies.

The study plan appears adequate for these resources, all resource reports will need to describe study areas and methods and results of surveys by species.

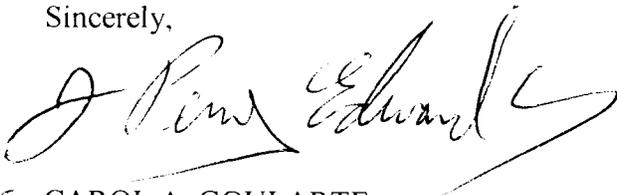
Page 7, Identify traditional and existing subsistence uses of fish, wildlife.....

Action: Perry said he would contact the USFS subsistence specialist to determine if and how a survey might be taken.

We recommend the City work with Phil Mooney, Alaska Department of Fish & Game wildlife biologist to theorize how subsistence may be different for mountain goat and deer hunting (easier access).

Please address all inquires and comments regarding the Project to me, by mail at the address listed above; by phone 747-4218; by fax 747-4253; or by email at cgoularte@fs.fed.us. Please copy (cc) Melissa Dinsmore, by email at mdinsmore@fs.fed.us; by phone at 747-4201.

Sincerely,



for CAROL A. GOULARTE
District Ranger