

DRAFT SUBSISTENCE RESOURCES STUDY PLAN

Blue Lake Hydroelectric Project, FERC No. 2230 Relicensing

Prepared by:

City and Borough of Sitka Electric Department

105 Jarvis St., Sitka AK, 99835

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INTRODUCTION AND BACKGROUND

This Draft Subsistence Resources Study Plan describes proposed studies related to relicensing of the Blue Lake hydroelectric project (“Project”, Federal Energy Regulatory Commission (FERC) No. 2230)), owned by the City and Borough of Sitka, FERC licensee, and operated by the City and Borough of Sitka Electric Department (collectively, the “City”).

The City is in the process of obtaining a new license for the Project. In the relicensing process, the City must make available to the FERC information on existing natural resources potentially affected by the relicensing action. The FERC will use that information to characterize the environmental baseline in various impact evaluation and other decision documents.

The City distributed an Initial Consultation Document (ICD) and held agency and public meetings and a site visit in November and December, 2002. In comments on the ICD dated February 14, 2003, the US Forest Service stated that

“The city of Sitka is designated as a rural community by the Federal Subsistence Board. This designation allows residents of Sitka to harvest fish, wildlife and plant resources under federal subsistence rules. All of the project components (reservoir, Sawmill Creek, access road, and power transmission line) lie within close proximity to the city of Sitka. Knowledge of existing subsistence uses is needed to evaluate the effects of current and future project operations on the ability of subsistence users to access resources.”

In September, 2003, the City distributed Scoping Document 1 as part of the National Environmental Policy Act (NEPA) process for the relicensing. In comments on SD1 dated December 23, 2003, USFS stated:

“In our February 14, 2003 response to the Initial Consultation Document, we requested the CBS to determine the effects of the project on subsistence activities and resources in or near the project area. Thus far in the pre-filing process the CBS has not outlined

within the Initial Consultation Document or SD1 how they will address subsistence uses within or near the project area.”

In response to those comments, the City committed, in Scoping Document 2 (SD2), to prepare a draft subsistence resources study plan. In comments dated May 7, 2004, USFS stated:

“In our February 14, 2003, response to the Initial Consultation Document, and our December 23, 2003, response to SD1, we requested the CBS to determine the effects of the project on subsistence activities and resources in or near the project area. I feel the response (Sub1) to our comment (FS6) dismisses the issue without any study”

CITY’S GENERAL RESPONSE TO USFS COMMENTS

The City fully intends to address subsistence during the relicensing process. However, because we propose no changes in the Project design and have yet to determine changes in operation (related, we expect, primarily to instream flow releases to improve existing Sawmill Creek fish habitat), we expect few if any relicensing-related impacts on subsistence resources. Therefore, this draft plan proposes gathering of background information on subsistence, primarily harvest of fish and wildlife by subsistence users, as recommended by USFS (below) for use in the AFFECTED ENVIRONMENT section of the Preliminary Draft Environmental Assessment required in the relicense application. Impacts on these documented subsistence resources will be determined by evaluation of proposed Project operation changes as they might affect harvest of fish and wildlife by subsistence users.

This draft plan will be distributed for review by all consulting resource agencies, and finalized prior to the beginning of any information gathering, which is expected to begin in summer, 2004.

PROPOSED SUBSISTENCE RESOURCES STUDIES

In their February 14, 2003 comments on the ICD, the USFS recommended the following methods for subsistence resources studies:

“State and federal agencies and local tribal governments maintain harvest records of fish and wildlife that can be used to assess subsistence uses within the project area. Conducting surveys within the community of Sitka and conducting personal interviews with long time residents of the area who may be familiar with subsistence uses within the project area would augment harvest data.”

Blue Lake Project subsistence resource studies will be done primarily through literature and information review as described in detail below. City personnel and existing contractors will gather subsistence data and prepare relevant reports and license application material.

LITERATURE AND INFORMATION REVIEW

Literature Review

The City will research available subsistence resources literature and information, including:

ADF&G fish and game harvest records for Sawmill Creek and Blue Lake;
City reports documenting fishing pressure on Sawmill Creek and Blue Lake.

Most of the relevant available literature resides at the USFS Sitka Ranger District and the ADF&G offices in Sitka AK or may be found in the City's fisheries and wildlife baseline survey studies conducted for the Project relicensing. The City will also search other sources, including academic and resource agency libraries and files, as appropriate.

Interviews With Sitka Tribe of Alaska (STA) Representatives and Other Subsistence Users.

The subsistence resources contractor and selected City representatives may interview STA members to determine subsistence uses within the Project area. Confidentiality of the information will be given the utmost consideration. The interview(s) will be documented in the manner desired by STA.

The City may interview typical subsistence users in the area to determine level and kinds of such use in the project area. The City will also interview the USFS campground host at the Sawmill Creek campground to obtain any further information. These people have most likely only been on site for the current season. They could attest to current year activities, but unless they had been there several seasons, they would not have any info regarding past years.

FIELD STUDIES

While no field studies are currently envisioned for subsistence resources, certain relevant data may be obtained from ongoing Project-related fish and wildlife surveys. Field observations of fishing pressure and hunting use near Sawmill Creek and Blue Lake are currently made as part of routine fisheries data collection in those areas.

REPORTING

The City will prepare a draft report documenting both the literature review and field surveys components of the study. The report will be organized in traditional technical report format, including:

INTRODUCTION and BACKGROUND

MATERIALS AND METHODS

Literature Review and Interview Methods

Data Recording, Reduction and Analysis Methods

RESULTS

Literature Review and Interview Methods

Plant and animal species utilized

History of use

DISCUSSION

Comparison with Similar Southeast Alaska Subsistence Information

Overall Significance of Findings

RECOMMENDATIONS and CONCLUSIONS (related primarily to need for further study).

STUDY AND REPORT SCHEDULE

The subsistence resources studies should commence in mid-summer, 2004 and the report should be available as a draft by early fall, 2004. If further surveys are required, the effort may lapse into 2005, recognizing that weather and access may preclude further surveys until summer of that year.