

FINAL 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

May, 2004

INTRODUCTION AND BACKGROUND

This 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.

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;
- ADF&G Community Profile Database (CPDB) for subsistence.

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. Campground users and hosts have probably been on site for the current season, limiting applicability of their information to the recent past.

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. To the extent that the fish and wildlife researchers are able to distinguish between sport and subsistence fishing and hunting uses in the field, their information may be of use in the subsistence evaluation.

REPORTING

The City will prepare a draft report documenting both the literature review, information gathering, and field survey 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 summer or fall, 2004 and the report should be available as a draft by late 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.

CONSULTATION

A draft of the Subsistence Resources Study Plan was distributed for review on June 9, 2004 (Attachment I). Comments were received from US Forest Service (USFS), US Fish and Wildlife Service (FWS), Sitka Tribe of Alaska (STA) and Alaska Department of Fish and Game (ADF&G). Most comments were provided via e-mail, copies of which are in Attachment II. The USFS comments were via changes on the electronic copy of the file. Those changes have been addressed in this final version.

Comments from FWS suggested that the Plan be reviewed by Dr. Bob Schroeder of USFS, Juneau, and showed concern for generalities regarding the interview process and potential adequacy of the literature review. We have noted FWS's concerns, but have made no changes to the Plan in response to those comments. Since the literature review and interviews have not been conducted, we have no way of knowing whether either will be adequate in scope. We believe that, through the report review process, concerns about level of detail and exact content of interviews will be addressed.

ATTACHMENT I

City Transmittal Letter for Draft Subsistence Resources Study Plan

From: Cmikeprewitt@aol.com [mailto:Cmikeprewitt@aol.com]
Sent: Wednesday, June 09, 2004 11:14 AM

To: Nicholas.Jayjack@ferc.gov; kevin_brownlee@fishgame.state.ak.us;
mbeilharz@fs.fed.us; phil_mooney@fishgame.state.ak.us; linda.shaw@noaa.gov;
bob_chadwick@fishgame.state.ak.us; christopher_estes@fishgame.state.ak.us;
joe_klein@fishgame.state.ak.us; dean@cityofsitka.com;
Richard_Enriquez@fws.gov; john_dunker@dnr.state.ak.us; kcoffin@fs.fed.us;
jim_powell@dec.state.ak.us; john_derhovanisian@fishgame.state.ak.us;
cgoularte@fs.fed.us; judy_bittner@dnr.state.ak.us; lon_garrison@nsraa.org;
john.r.klutz@poa02.usace.army.mil; keven_kleweno@rca.state.ak.us;
joe_donohue@dnr.state.ak.us; campbell@cityofsitka.com;
benjamin_white@dnr.state.ak.us; hvonrekowski@fs.fed.us;
ddobyns@sitkatribes.org; Katharine.Miller@noaa.gov; mdinsmore@fs.fed.us;
charlie@cityofsitka.com; jacklorrigan@sitkatribes.org;
carey@cityofsitka.com; jim_ferguson@fishgame.state.ak.us;
dkelliher@fs.fed.us

Subject: Draft Subsistence Study Plan, Blue Lake Project, FERC No. 2230

Attached please find the subject draft study plan. The background for its preparation is outlined in the plan.

This plan's subject matter may be outside your area of expertise or agency interest, in which case do not feel the need to comment on it. Agencies with direct involvement in Alaska's subsistence program or others with general interest should provide comments at your earliest convenience. You may list comments or edit directly on the MS Word document and forward your comments to me with a cc to Charlie Walls. Please don't hesitate to contact me or Charlie by phone (206-525-3483, 907-747-6633, respectively) or via e-mail if you have questions. Thanks for your continued involvement in the Blue Lake Project Relicensing.

C. Mike Prewitt, Blue Lake Project Relicensing Consultant. (See attached file: dr_subsistence_sp.doc)

ATTACHMENT II

Comments from Resource Agencies and STA on Draft Subsistence Resources Study Plan

STA Comments, Doug Dobyns

Subj: **RE: Draft Subsistence Study Plan, Blue Lake Project, FERC No. 2230**
Date: 6/9/2004 12:57:05 PM Pacific Daylight Time
From: ddobyns@sitkatribе.org
To: Cmikeprewitt@aol.com
Sent from the Internet

In just reading this over today, I agree with your approach and assessment of the relevance of subsistence to the operation of the plant. We would like to know who you wind up contacting for interviews, and also when any campground interviews are conducted. In asking a few people about the use of the Blue Lake drainage several months ago (just cursory on my part) I found the major interests were access for hunting, maybe some fishing on the lake, and very little intention to use the stream below the dam. The problem of course is what use might have been made of the stream before the dam was built --- if the history prior to the 50-year license is relevant, then we would have a higher interest. Has this been determined in a FERC ruling, or anything like that?

Doug Dobyns

STA Comments, Jack Lorrigan

Subj: **RE: Draft Subsistence Study Plan, Blue Lake Project, FERC No. 2230**
Date: 6/15/2004 10:59:32 AM Pacific Daylight Time
From: jlorrigan@sitkatribе.org
To: Cmikeprewitt@aol.com
Sent from the Internet

Mr. Prewitt,

I don't know where these comments will go or how they will be gathered, but I feel I should share some of my personal information on this subject.

Of those subsistence resources currently considered by ADF&G Boards of Fish and Game, Mountain Goats in this area are not on the list. However, Tlingit people have been using these animals for millennia as attested by our Chilkat Blankets. Only their introduction to this island makes them a little easier for Sitka Tlingit to access. Now we don't have to barter or travel to traditional areas for them. Blue Lake is an important area for locals to harvest their goats not only for the meat but in many cases for the hide for rugs or even blankets. Recently the Sitka Tribe was awarded 3 spring goat tags to harvest for the specific reason of getting winter wool for traditional weavers to craft yarn for traditional blanket weaving. Although the goats were not taken from Blue Lake this year, some of us did observe and consider taking some of those goats. Blue Lake was important for that kind of access.

Deer are harvested all over that watershed yearly. I don't know about trapping.

Over the years I've lived here I have heard people comment on the Rainbow fishing in the lake and how much they enjoy it and look forward to each spring and summer for fishing it. Although the bag limits change over the years, the importance of fishing this lake with regularity is becoming customary and traditional for both native and non-native.

I hope these comments will have relevance in this matter.

Sincerely,
Jack Lorrigan

FWS Comments

Subj:	CommentsDraft Subsistence Study Plan, Blue Lake Project, FERC No. 2230
Date:	6/25/2004 7:02:39 PM Pacific Daylight Time
From:	Helen_Armstrong@fws.gov
To:	Cmikeprewitt@aol.com
CC:	Pete_Probasco@fws.gov , jim_ferguson@fishgame.state.ak.usm , Steve_Klein@fws.gov , Bruce_G_Halstead@fws.gov , Pat_Petrivelli@fws.gov
File:	dr_subsistence_sp.doc (35328 bytes) DL Time (32000 bps): < 1 minute
<i>Sent from the Internet</i>	

Dear Mike,

The Office of Subsistence Management, US Fish and Wildlife Service, has reviewed the Draft Subsistence Study Plan for the Blue Lake Project. The plan was brief and general and was thus difficult to assess without more information regarding how the research will be conducted, the interview methods to be used, the questions that will be asked, and who will be conducting the research. The two anthropologists who reviewed the plan are not specialists in Southeast Alaska and were unable to quickly assess the adequacy of the subsistence use data for Sitka. If the plan has not already been sent to Bob Schroeder, the anthropologist with the Forest Service most familiar with the Southeast, it should be. Dr. Schroeder would be able to help you assess whether or not a literature review and review of data collected previously will be adequate for your study. Our initial guess is that a more in-depth study will have to be conducted and that a review of the existing data and literature will be inadequate. We would also like to encourage you to work with the Subsistence Division at the ADF&G or Bob Schroeder at the FS when developing your interview methods. How interviewing is conducted and the questions asked are critical to the success of the research.

If you have any questions, please do not hesitate to contact me at 907-786-3880.

Sincerely,

Helen Armstrong
Acting Coastal Resources Division Chief
3601 C Street, Suite 1030

Anchorage, AK 99503
907-786-3880

ADF&G Comments

Subj: **Sitka Subsistence Study**
Date: 6/9/2004 2:14:38 PM Pacific Daylight Time
From: mike_turek@fishgame.state.ak.us
To: Cmikeprewitt@aol.com
CC: bob_chadwick@fishgame.state.ak.us
Sent from the Internet

Mr. Prewitt, Your email of June 9, concerning the Blue Lake Hydro Subsistence Draft Study Plan was forwarded to me by Bob Chadwick, ADF&G, Sitka. Please keep me informed of the project's status. The Subsistence Division has completed a number of studies, both quantitative and qualitative, in Sitka. Although we have not done any work specific to Saw Mill Creek other work we have conducted in Sitka may have included the area. I would recommend that you review our data for Sitka in our Community Profile Database (CPDB) which can be accessed through the ADF&G website, Subsistence.

If you have any questions please give me a call.

Sincerely,

Mike Turek, Regional Supervisor
ADF&G Division of Subsistence
Douglas, AK99824
Phone (907)465-3617

USFS Comment Letter (Comments were on electronic file)

Subj: **DRAFT Subsistence Study plan**
Date: 6/7/2004 1:59:10 PM Pacific Daylight Time
From: kcoffin@fs.fed.us
To: cmikeprewitt@aol.com
CC: mdinsmore@fs.fed.us
File: **DRAFTSUBSISTENCERESOURCESSTUDYPLAN.doc** (36352 bytes) DL Time (49333 bps): < 1 minute
Sent from the Internet

Mike,

Attached is a copy of the Draft Subsistence study plan with my comments.

(See attached file: DRAFT SUBSISTENCE RESOURCES STUDY PLAN.doc)

kwc

Ken Coffin
Fisheries Biologist
Tongass NF - Sitka Ranger District
204 Siginaka Way - Sitka, AK 99835
(907)747-4343 (o) - (907)747-4253 (f)