



United States
Department of
Agriculture

Forest
Service

Alaska Region
Tongass National Forest
Ketchikan-Misty Fiords
Ranger District

3031 Tongass Avenue
Ketchikan, AK 99901-5743
Phone: (907) 225-2148
Fax: (907) 225-8738

File Code: 2770

Date: July 11, 2012

Eric Wolfe
SEAPA
1900 First Avenue, Suite 318
Ketchikan, AK 99901

Dear Mr. Wolfe:

Thank you for the opportunity to review the preliminary study plans for the Swan Lake Expansion Project.

The Forest Service suggestions and minor corrections/adjustments to the study plans are enclosed. During our review, it was assumed that National Forest System (NFS) lands would be affected by the project. Overall, the effects on resources should remain the same as those analyzed during the original NEPA and FERC licensing processes.

The Tongass National Forest Land and Resources Management Plan (Forest Plan) has been revised and amended several times since the Swan Lake project was licensed in 1980. Please note that any activities on NFS lands must be in compliance with the current Forest Plan. The updated Region 10 sensitive species list (2009) must be used in the studies. Additionally, it will be necessary to address any project activities that will take place in Inventoried Roadless Areas.

If studies are taking place on NFS lands, a special use permit is required. Forms were provided on June 20, 2012 but to date the Forest Service has not received an application.

If you have any questions, please contact Jeannie Blackmore, Natural Resource Specialist, at 907.228.4120 or jblackmore@fs.fed.us.

Sincerely,

JEFFREY DEFREEST
District Ranger

Enclosure

cc: Barbara Stanley - R10 Energy Coordinator, Finlay Anderson - Long View Associates



Cultural Resource Study	<p>Cultural resources were addressed during the FERC licensing process for the Swan Lake Project in 1978 and again 1997. The dam itself is not 50 years old and is therefore not likely to be eligible for the National Register of Historic Places. Data obtained during this study will help inform future relicensing concerns.</p> <p>The project consultation plan and research design including background research, inventory plan and cultural resources site inventory including an intensive pedestrian cultural resource survey in the high sensitivity areas around Swan Lake should be adequate to fulfill cultural requirements as set out in the National Historic Preservation Act and the National Environmental Policy Act.</p>
Fish Community and Aquatic Habitat Study	<p>The Fish Community portion of the study is most likely applicable to Alaska Department of Fish and Game (ADFG). The Aquatic Habitat portion of the study is of interest to the Forest Service, especially on lands administered by the Tongass National Forest.</p> <p>The study design and methods appear to be adequate.</p> <p>The study appears to be capable of generating a quantification of habitat, on National Forest System (NFS) lands, affected due to inundation. It would be most useful to the Forest Service in assessing effects if the eventual report displayed the information in terms of</p> <ul style="list-style-type: none">• Amount of habitat affected broken down by tributary and stream channel type• Amount of shoreline habitat affected
Soils Study	<p>Soil Erosion, Productivity and Landslides: The study design and methods appear to be adequate.</p> <p>If the 350 foot elevation level includes NFS lands, minor soil erosion, productivity losses and landslides can be expected on NFS lands to result from the proposed action.</p> <p>With the exception of surface erosion control measures, very little can be done to mitigate these effects. Given the projects beneficial effects, adverse erosion, productivity, and landslide effects are minor and acceptable.</p>
Spawning Study	<p>Most of the information collected in this study is most likely applicable to ADFG.</p> <p>The study design and methods appear to be adequate.</p> <p>The FS would be interested in knowing the location and amount of spawning habitat located on NFS lands. The Forest Service would also like to see a quantification of spawning habitat on NFS lands affected by inundation.</p>
Tributary Access Study	<p>This study is a computer modeling exercise and design and methods appear to be adequate.</p>

Vegetation Study	<p><i>Study Goals and Objectives:</i> Need to clarify that pre-field reviews and surveys (if applicable) are to be conducted for both sensitive and rare plants (there are no threatened or endangered plants on the Tongass National Forest), and invasive plants.</p> <p>There is no discussion pertaining to potentially inundated timber on NFS lands. Include only if NFS timber is involved.</p> <p><i>Methods:</i> Wetlands: There appears to be NFS lands including wetlands below 350 foot elevation and above the current high water level in the Swan Lake reservoir. The proposed study should be modified (if needed) to confirm whether or not the 350 foot elevation includes NFS lands and whether wetlands will be impacted.</p> <p>In addition to wetlands, need to describe the general vegetation and habitats of the project area, including forest plant associations, if applicable.</p> <p>If NFS timber will be inundated, a timber settlement agreement may be required; timber species, volume and acreage will need to be collected.</p> <p>Depending on local site factors, closed-canopy forest may be high-probability habitat for some rare or sensitive species, such as <i>Platanthera orbiculata</i>.</p> <p>A TES Plant Element Occurrence Field form must be completed for each rare and sensitive plant sighting</p> <p>An Invasive Plant Survey and Inventory Field Form must be completed for invasive plant surveys and/or sightings.</p> <p>Survey botanists must meet the minimum qualifications as specified in Forest Service Manual (FSM) 2670.5 (R10 Supplement). Botanists conducting BEs must have journey-level qualifications that include meeting OPM Qualification Standards for the 0430 job series at the GS-9 level or above. FSM 2672.43 designates pre-field reviews and surveys as part of the BE process.</p> <p><i>Schedule:</i> On the Tongass NF, field surveys for rare and sensitive plants generally occur between mid-June and mid-August. Surveys for invasive plants may occur into September.</p> <p><i>Reporting:</i> The Corps of Engineers should be consulted as to whether the current Clean Water Permit covers the proposed expanded new reservoir footprint or if a new permit is required.</p> <p>To avoid confusion, clarify whether the report will include only the results of field work. If so, it should be called a Botany Survey Report, not a Botany Resource Report.</p> <p>If it is to be a Botany Resource Report, then it must include an effects analysis for general vegetation and rare plants, and a summary of the effects analysis for sensitive plants from the Biological Evaluation. If the project involves any ground-disturbing activities, then an Invasive Plant</p>
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	<p>Risk Assessment should be completed. This can be incorporated into the Botany Resource Report.</p> <p>If NFS timber will be inundated, a timber cruise is required and includes:</p> <ul style="list-style-type: none">• Acres of affected (inundated) NFS forest land• Timber volume (gross and net) and grade, by species, within those affected acres• Site index data on affected forested acres <p><i>References:</i> Add Dillman and Krosse. 2009. Guidance for preparing a Botany Resource Report – Tongass National Forest.</p>
Wildlife Study	<p><i>Methods pertaining to goshawk surveys:</i> If the project will inundate NFS lands, survey suitable habitat around the lake in addition to the dam. Given the proposed timeline, surveys should begin this summer (2012) with follow-up in 2013.</p> <p><i>Schedule:</i> Bullets state surveys will be conducted in 2013 with a final report submitted to SEAPA in November 2012. Surveys should be done in 2012 BEFORE project reports are completed with additional follow-up in 2013.</p>
General Comments	<p>Overall, the effects on resources should remain the same as those analyzed during the NEPA and FERC licensing processes.</p>
