

## Finlay Anderson

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**From:** Johnson, Shawn L (DFG) <[shawn.johnson@alaska.gov](mailto:shawn.johnson@alaska.gov)>  
**Sent:** Friday, July 12, 2013 4:35 PM  
**To:** Finlay Anderson  
**Cc:** 'Anderson, James W (DNR)'; Porter, Boyd (DFG); [bstanley@fs.fed.us](mailto:bstanley@fs.fed.us); Cory Warnock; 'Eric Wolfe'; Gundelfinger, Clint E (DNR); [jblackmore@fs.fed.us](mailto:jblackmore@fs.fed.us); Piazza, Kelly S (DFG); Minnillo, Mark J (DFG); Miller, Monte D (DFG); 'Sharon Thompson'; [steve.negri@tetrattech.com](mailto:steve.negri@tetrattech.com); [steve\\_brockmann@fws.gov](mailto:steve_brockmann@fws.gov); 'Susan Walker'; Schwarz, Terence C (DNR); 'Trey Acteson'  
**Subject:** Swan Lake Expansion Project (FERC No. 2911) ICD

Good Afternoon Finlay,

The Alaska Department of Fish and Game has reviewed the Initial Consultation Document for the Swan Lake Expansion Project (FERC No. 2911) and found it thorough and well presented. Due to your early consultation with agencies and stakeholders on resource issues, study needs, study plans, and study reports, we have no additional information or study requests. Thank you for your efforts on this license amendment process.

Shawn Johnson  
Region 1 Instream Flow Coordinator  
Alaska Department of Fish and Game  
Division of Sport Fish / RTS  
P.O. Box 110024  
Juneau, Alaska 99811-0024  
(907) 465-4302

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**From:** Finlay Anderson [<mailto:finlay.anderson@mcmillen-llc.com>]  
**Sent:** Monday, July 08, 2013 7:36 AM  
**To:** 'Anderson, James W (DNR)'; Porter, Boyd (DFG); [bstanley@fs.fed.us](mailto:bstanley@fs.fed.us); [cory.warnock@mcmillen-llc.com](mailto:cory.warnock@mcmillen-llc.com); 'Eric Wolfe'; Gundelfinger, Clint E (DNR); [jblackmore@fs.fed.us](mailto:jblackmore@fs.fed.us); Piazza, Kelly S (DFG); Minnillo, Mark J (DFG); Miller, Monte D (DFG); 'Sharon Thompson'; Johnson, Shawn L (DFG); [steve.negri@tetrattech.com](mailto:steve.negri@tetrattech.com); [steve\\_brockmann@fws.gov](mailto:steve_brockmann@fws.gov); 'Susan Walker'; Schwarz, Terence C (DNR); 'Trey Acteson'  
**Subject:** FW: 05-22-2013 Draft Swan Pool Raise Joint Meeting Summary.docx

Good morning all –

A couple of reminders regarding the Swan Lake Expansion Project. I would appreciate comments on the meeting notes from our Joint Meeting (attached) by **end of day today**. If you expect to make comments, and this deadline is not possible let me know and we can make adjustments. Otherwise, I will take absence of comments as approval.

SEAPA is expecting comments on the ICD and any study/information requests that are not already captured in our consultation history by **July 12**. For this deadline, I will be more anxious about documentation, so pardon (in advance) my badgering! Please let me know if you have questions, or if you need any clarifications.

Thanks

**Finlay Anderson**  
Senior Licensing and Regulatory Specialist

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**From:** Finlay Anderson [<mailto:finlay.anderson@mcmillen-llc.com>]

**Sent:** Monday, June 17, 2013 10:25 AM

**To:** 'steve.d.lindamood@usace.army.mil'; 'Anderson, James W (DNR)'; 'boyd.porter@alaska.gov'; 'bstanley@fs.fed.us'; 'cory.warnock@mcmillen-llc.com'; 'Eric Wolfe'; 'jblackmore@fs.fed.us'; 'kelly.piazza@alaska.gov'; 'Mark Manillo'; 'monte.miller@alaska.gov'; 'Sharon Thompson'; 'Shawn Johnson'; 'steve.negri@tetrattech.com'; 'steve\_brockmann@fws.gov'; 'Susan Walker'; 'ted.deats@alaska.gov'; 'terence.schwarz@alaska.gov'; 'Trey Acteson ([tacteson@seapahydro.org](mailto:tacteson@seapahydro.org))'

**Subject:** 05-22-2013 Draft Swan Pool Raise Joint Meeting Summary.docx

All –

As follow up to our meeting in May, I have attached a summary of our discussions and action items of which I took note. One request you all made was to revise the schedule to show delivery of final resource reports in advance of any draft amendment/PDEA; this I have done and the new schedule is appended to the end of the notes.

Please let me know by July 8th whether you have comments or suggestions on the notes and/or revised schedule. Note that nobody had expressed concern about the July 12<sup>th</sup> deadline for comments on the ICD or study requests, so have left that schedule as presented. As expressed in the ICD, it is possible the schedule will require further changes as we work through the process.

Thanks

**Finlay Anderson**

Senior Licensing and Regulatory Specialist

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## Finlay Anderson

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**Subject:** FW: FW: 05-22-2013 Draft Swan Pool Raise Joint Meeting Summary.docx

**From:** Susan Walker - NOAA Federal [mailto:[susan.walker@noaa.gov](mailto:susan.walker@noaa.gov)]

**Sent:** Friday, July 12, 2013 5:09 PM

**To:** Finlay Anderson

**Cc:** Anderson, James W (DNR); [boyd.porter@alaska.gov](mailto:boyd.porter@alaska.gov); Barbara Stanley; Cory Warnock; Eric Wolfe; Gundelfinger, Clint E (DNR); [jblackmore@fs.fed.us](mailto:jblackmore@fs.fed.us); [kelly.piazza@alaska.gov](mailto:kelly.piazza@alaska.gov); Mark Manillo; Miller, Monte D (DFG); Sharon Thompson; Shawn Johnson; [steve.negri@tetrattech.com](mailto:steve.negri@tetrattech.com); [Steve\\_Brockmann@fws.gov](mailto:Steve_Brockmann@fws.gov); Schwarz, Terence C (DNR); Trey Acteson

**Subject:** Re: FW: 05-22-2013 Draft Swan Pool Raise Joint Meeting Summary.docx

Hi Finlay -

I am sorry that this is late. NMFS has reviewed the Swan Lake Expansion Project's Initial Consultation Document (FERC No. 2911) and we have no additional study or information requests. We find the ICD to be thorough and complete. Despite our inability to fully participate in the licensing process due to workload, we find that you have thoroughly identified and addressed resource issues and study needs through early consultation with ADFG and other agencies and stakeholders and developed appropriate study plans. Please keep us informed on this license amendment process so that we may participate if needed and our staffing and budget allows, including review of the draft resource reports in August.

Sue Walker

On Mon, Jul 8, 2013 at 7:35 AM, Finlay Anderson <[finlay.anderson@mcmillen-llc.com](mailto:finlay.anderson@mcmillen-llc.com)> wrote:

Good morning all –

A couple of reminders regarding the Swan Lake Expansion Project. I would appreciate comments on the meeting notes from our Joint Meeting (attached) by **end of day today**. If you expect to make comments, and this deadline is not possible let me know and we can make adjustments. Otherwise, I will take absence of comments as approval.

SEAPA is expecting comments on the ICD and any study/information requests that are not already captured in our consultation history by **July 12**. For this deadline, I will be more anxious about documentation, so pardon (in advance) my badgering! Please let me know if you have questions, or if you need any clarifications.

Thanks

**Finlay Anderson**  
Senior Licensing and Regulatory Specialist

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## Finlay Anderson

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**From:** Brockmann, Steve <steve\_brockmann@fws.gov>  
**Sent:** Friday, July 12, 2013 6:16 PM  
**To:** Finlay Anderson  
**Subject:** Re: FW: 05-22-2013 Draft Swan Pool Raise Joint Meeting Summary.docx

U.S. Fish and Wildlife Service has no comments.

On Mon, Jul 8, 2013 at 7:35 AM, Finlay Anderson <[finlay.anderson@mcmillen-llc.com](mailto:finlay.anderson@mcmillen-llc.com)> wrote:

Good morning all –

A couple of reminders regarding the Swan Lake Expansion Project. I would appreciate comments on the meeting notes from our Joint Meeting (attached) by **end of day today**. If you expect to make comments, and this deadline is not possible let me know and we can make adjustments. Otherwise, I will take absence of comments as approval.

SEAPA is expecting comments on the ICD and any study/information requests that are not already captured in our consultation history by **July 12**. For this deadline, I will be more anxious about documentation, so pardon (in advance) my badgering! Please let me know if you have questions, or if you need any clarifications.

Thanks

**Finlay Anderson**  
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File Code: 2770

Date: July 17, 2013

Mr. Trey Acteson, CEO  
Southeast Alaska Power Agency  
1900 First Ave., Suite 318  
Ketchikan, AK 99901

Dear Mr. Acteson:

Thank you for the opportunity to comment on Southeast Alaska Power Agency's (SEAPA) Initial Consultation Document (ICD) for the Swan Lake Hydroelectric Project, FERC P-2911. The Forest Service understands that this document initiates the first stage of the consultation process for a non-capacity amendment for the Swan Lake hydropower project.

We commend SEAPA for contacting state and federal agencies early in the process to discuss key resource issues and study plan development. The Forest Service previously reviewed and commented on SEAPA's draft study plans and draft study reports. SEAPA responded to our comments in both the ICD and in the specific final resource study reports. In addition, SEAPA indicated that many of our previous comments will be further addressed in future documents.

Attached are our comments on the ICD. We are requesting no new studies at this time and most of our comments consist of editorial remarks or minor corrections.

If you have any questions, please contact Barbara Stanley at (907) 228-6262 or Jeannie Blackmore at (907) 228-4120.

Sincerely,

/s/ Theron Schenck for  
FORREST COLE  
Forest Supervisor

Enclosure



**Forest Service Comments on the Initial Consultation Document**  
**for the**  
**Swan Lake Hydroelectric Project, P-2911**  
**Non-Capacity License Amendment**

**Page 1 1. Introduction** *“With a new run-of-the river project generating during the summer and fall”*  
Has a decision been made to develop a new run-of-river project – or is this a hypothetical statement?  
Confusing.

**Page 3 1.2 Background** *“During preliminary licensing, RW Beck considered the inclusion of Grace Lake into the Project.....KPU chose not to further pursue Grace Lake options.”* USGS maps reference this lake as Lake Grace.

**Page 7 2.1 Purpose of Action** *“help integrate present and expected future run-of-river hydropower projects”* Are there actual projects or is this a hypothetical statement? Names of the projects?

**Page 10 Table 3.1.1 Second Stage Consultation** In addition, the Forest Service requests that the Final Resource Reports also be reviewed prior to the Preliminary Draft Environmental Assessment (PDEA). This will expedite the PDEA review.

**Page 15 4.2 Project Facilities** *“Components of these facilities, as currently configured and as proposed, are described in the sections below.”* Section 4.2 describes the project facilities, the power tunnel, powerhouse and other facilities below the dam, but fails to describe them further in the components breakdown. Section 4.2.3 *Appurtenant Facilities* describes what will happen but not what exists. Consider including all facilities within U.S. Survey 11630 Lot 1 and Lot 2.

**Page 17 4.2.2.2. Proposed** *“When the modifications presented in section 4.2.1 were complete...”* The word should be *are*, rather than *were*.

**Page 17 4.2.2.2 Proposed Figure 4.2-2** *“Figure 4.2-2 shows the Project area above the dam including the area of inundation as a result of the Proposed Action.”* The figure does not show the area of inundation, rather the FERC boundary. Clarification should be made; these areas could be one and the same. Perhaps simply fill in the FERC boundary with water to show proposed inundation levels.

**Page 22 4.3 Project Operations** *“Additional hydropower plants are being planned in Southeast Alaska to displace diesel-generated electrical power.”* The Draft Resource Report and PDEA would benefit if a table and figure of the planned and existing sites were included. This would help readers understand how Swan Lake fits into the overall hydropower picture in Southeast Alaska.

**Page 28 5.1 Basin Overview** General observational comment. English and metric units are both used to describe the basin.

**Page 28 5.1 Basin Overview** *“Additionally, Carroll Creek is an important salmon spawning stream supporting runs of pink, chum, and coho salmon. KPU (1979) also discusses a small population of Chinook salmon that has become established in this area.”* If the intent of this paragraph is to describe only

salmon, then disregard the following suggestion related to other anadromous salmonids. If the intent of this paragraph is to address all anadromous salmonids, the Alaska Department of Fish and Game Anadromous Waters Catalog (AWC) additionally show steelhead present in Carroll Creek. It is highly likely anadromous cutthroat trout and Dolly Varden char utilize Carroll Creek although no supporting information was found in Ketchikan-Misty Fiords Ranger District fisheries files.

Additionally, the Draft Resource Report and PDEA should address the eulachon (*Thaleichthys pacificus*) run present in the Carroll Estuary. The AWC reports eulachon present in Carroll Creek and the Forest Service documented eulachon spawning in Carroll Creek and estuary in 2011 and 2012. In addition, eulachon are known to be present in the intertidal zone in front of the powerhouse. Eulachon are an important subsistence resource.

**Page 29 5.2 Geology and Soils** General editorial comment. The reference to Nowacki et al. 2001 is spelled incorrectly (Norwacki et al. 2001). This is also misspelled in the Literature Cited section on page 99.

**Page 29 5.2 Geology and Soils** *“The 2012 Study area for examining potential effect to soils from the Proposed Action includes the “analysis area”, as described by Forest Service Manual 2554. For the Project, the “activity area” was between the current spillway crest...and the proposed new dam crest elevation.”* There are references to project area, analysis area, activity area and survey study area throughout the document (i.e. page 30, *“...two thirds of the soils within the Project area...”* page 55 *“...may occur outside the analysis area.”.....*). As written, it is not clear what the differences are or if the terms are interchangeable. Defining these terms and/or consistency in their use would be helpful. The Forest Service understands that future NEPA documents will clarify this.

**Page 30 5.2.1. Existing Environment** *“Twenty-six of these acres were previously not conveyed...”* Conveyed to whom? Current land status?

**Page 32 Table 5.2-1 MMI4 soils** Per Appendix A, page 4, mass wasting areas (MMI4) need to be identified, mapped and data shared with the State and the Forest Service so GIS layers can be updated.

**Page 33 5.3.1 Existing Environment.** There is no discussion of the lake itself, bathymetric data (maximum depth?), or existing thermal stratification (and effects of increased lake level on stratification). Please add for the Draft Resource Reports and the PDEA.

**Page 33 5.3.1 Existing Environment** *“Given the generally pristine nature of the area and the fact that minimal alteration to water use has occurred, the information provided below remains accurate.”* The Draft Resource Report and PDEA would benefit by clarifying ‘minimal alteration to water use’. Do the authors mean there are no other human users of this water and the original Swan Lake Hydroelectric Project did not change that, or are they referring to designated uses of water defined in Alaska State Law?

**Page 35 5.3.1.3 Existing and Proposed Uses of Water** *“Under the existing condition, the only use of water in the Falls Creek drainage is the Swan Lake Hydroelectric Project.”* Suggest clarifying this sentence in the Draft Resource Report and PDEA. Do the authors mean human user of water as the only permitted use, or are they referring to designated uses of water? Please clarify in the context that there is no public water supply or other consumptive use in the watershed. Other existing uses include aquatic habitat and recreation. Under Alaska State Law, growth and propagation of fish, shellfish, other aquatic life and wildlife is a designated use of water and by default all water bodies are protected for designated uses.

**Page 36 5.3.1.4 Existing Instream Flow Uses** *“No minimum instream flow requirement currently exists in Falls Creek below the Project. This is primarily due to the short, inaccessible reach that exists prior to*

*the creek entering Carroll Inlet. The falls at the mouth of Falls Creek prevent any anadromous fish from accessing the creek.* Although not on Forest Service administered lands, we bring up the following for consideration in the Draft Resource Report and PDEA. Suggest clarifying the apparent contradiction of this sentence with the fact that the outlet stream appears in the State's Anadromous Waters Catalog (# 101-45-10800) with pink and chum salmon verified. The falls is described as "90 meters upstream from tidewater" (ICD page 28). Is there no anadromous habitat in this reach? What about resident fish in the bypass reach between and above the falls? This could have bearing on discussion on instream flow and project mitigation measures. Do the stakeholders agree that no instream flow requirement is needed?

What is the current rate of spill into the bypass reach and does it support aquatic habitat? How will this project change the spill rate and any downstream aquatic habitat? Where does the tailrace enter the channel and what are the aquatic habitat conditions there? How will the project change those conditions?

**Page 36 5.3.1.6 Water Quality** Entire section. The Draft Resource Report and PDEA would benefit if the data reported in this section were compared to Alaska's Water Quality Standards. This could be done in a table accompanied by text. This section talks about high water quality levels, but does not fully describe why water quality is considered high. This would support their proposed finding of no potential effects to existing water resources in Section 5.3.2 Potential Effects.

**Page 38-39 5.4.1 Existing Environment** There is no fisheries Threatened Endangered Species discussion. See 2008 Tongass Land and Resource Management Plan FEIS page 3-75. Please include this discussion in the Draft Resource Report and PDEA.

**Page 66 5.5.2.4 Endemics** *"Although no small mammal surveys are required on islands greater than 50,000 acres in size, small mammals could be affected with a rise in pool elevation."* Items being compared appear to have no relationship to each other. Re-word.

**Page 67 5.5.3 Proposed Mitigation Measures.** *"...a management requirement would include a timber settlement agreement on the inundated timber on National Forest Service lands."* In addition to a timber settlement agreement on National Forest System lands, would a similar agreement be needed on State lands? A management requirement is not a mitigation measure.

**Page 68- 5.6.1 Existing Environment** Stating there are no botanical Threatened Endangered Species (TES) is appropriate; the botanical TES discussion is missing. See 2008 Tongass Land and Resource Management Plan FEIS page 3-105.

**Page 71 5.6.1.4 General Vegetation Types Table 5.6-3** This table lists acres in the analysis area by vegetation type. To better assess potential impact provide this information by ownership.

**Page 72 5.6.1.5 Emergent Sedge Wetlands** *"A few small emergent wetlands were observed outside the analysis area along existing roads and near existing facilities associated with dam operations."* The analysis area for wetlands should include both Lots 1 and 2, U.S. Survey 11630 (ICD pages 83 and 84). Consider changing in the Draft Resource Report and PDEA.

**Page 75 5.6.2.4 Old Growth Forest** *"Although unlikely, due to the lack of invasive plant species currently present in the analysis area, indirect effect to old-growth forest could also occur from invasive plant spread. Disturbance to/or adjacent to old-growth forest could increase the risk for invasive plant establishment. It is assumed that all old-growth within the analysis area would be lost."* Addressing invasive species in their own section would be more appropriate. The relationship between invasive species and old growth being lost is incongruous.

**Page 76 5.6.2.5 Young Growth Forest** *"...the young growth forest would likely not be affected by construction activities.....Potential impacts to young growth would potentially result from*



*inundation.....Temporary staging areas and improvements to existing roads however, might be needed for dam construction and might impact young growth.” This entire section needs condensing and clarification. Same comments pertaining to invasive species as noted in Page 75 5.6.2.4 Old-Growth Forest.*

**Page 77 5.6.2.6. Wetland Resources Effects from Construction Outside the Analysis Area** See analysis area comment for page 72: 5.6.1.5 Emergent Sedge Wetlands.

**Page 78 5.6.3 Proposed Mitigation Measure** *Entire section* This section is a copy of mitigation measures for wildlife. See our comment for page 67.

**Page 80 5.7.1.3 Land Use** *“Figure 5.7- identifies other LUDS in the general vicinity of the Project. These include Old Growth reserves to the southeast, timber production in the north and south, Remote Recreation and Modified Landscape.”* Actually the Old Growth Habitat is to the southwest, Remote Recreation to the northeast, and Modified Landscape to the northwest. Timber Production is correctly referenced.

**Page 86 5.7.2.3 Land Use** *“The proposed modifications are not inconstant with the LUDS as identified above....”* Grammatical comment. Double negative, suggest, “The proposed modifications appear to be consistent with the LUDS.”

**Page 87 5.8.3 Tribal Consultation** *“In addition to the tribes listed above, SEAPA is contacting the Sealaska Heritage Institute, a regional Native nonprofit organization.....”* Contacting Sealaska Corporation for comments would also be appropriate.

**Page 94 6.4 Wildlife Resources** *“During a meeting with Participants to discuss the 2012 study results (see Appendix A), additional issues associated with understanding impacts on wildlife were identified: Early season goshawk surveys and bald eagle surveys to be completed in June 2”* Clarification: the June goshawk survey was part of the original survey requirement per the provided Tongass goshawk protocol. It is the main sampling period for goshawks. These surveys were not added at the February meeting.

## **Appendix A: Final Meeting Summary**

**Page 4 Socioeconomics** The Forest Service made no comments pertaining to Socioeconomics. Comments related to hunting/fishing guide use should be included under Recreation.

## **Appendix B: Distribution List**

**Tribal Governments** Suggest sending information to President or Honorable Mayor, and Tribal Council Members rather than specific persons. Elections are regularly held and office holders often change. Sending to Tribal Council Members may trigger a response or committee person awareness.

## **Appendix C: Tributary Access Study Report**

No comments. Either the Final Study Report incorporated our comments or the forthcoming Draft Resource Report and PDEA will address our concerns.

## Appendix D: Soils Study Report

**Page 4 2.4 Field Investigation** *“Representative incidents of shoreline or near shoreline mass wasting were photographed and positions were recorded by GPS.”* Please share locations with State and Forest Service for GIS updates.

**Page 6 3.2 Soils within the Analysis Area Table 1** Adding a column for “observed mass wasting events” to Table 1 would be helpful to identify soil types where these events have occurred.

**Page 12 4.1 Identified Issues and Concerns Table -2 Measure or Indicator- Acres of soil inundated on NFS land.** Loss of soil productivity should be measured on all lands, although having NFS lands separated would be appreciated.

**Page 12 4.2 Soil Removed from Productivity by Inundation or Erosion** *“The project will result in an irreversible loss of approximately 138 acres of soil productivity. From the Table 1, it would be assumed that 138 acres of NFS lands (measurement or indicator) will be inundated. This is not the case. “About 26 acres of soils on NFS lands (lands outside of the Project’s boundaries at the 350-foot elevation contour) would be subject to inundation...”* Does the 138 acres include the 26 NFS acres?

## Appendix E: Fish Community and Aquatic Habitat Study Report

No comments. Either the Final Study Report incorporated our comments or the forthcoming Draft Resource Report and PDEA will address our concerns

## Appendix F: Spawning Study Report

No comments. Either the Final Study Report incorporated our comments or the forthcoming Draft Resource Report and PDEA will address our concerns.

## Appendix G: Wildlife Study Report

**Page 5&6 1.4.2. Other Regulations** *“Following is a partial list of federal laws...”* We suggest adding the Marine Mammal Protection Act (MMPA) of 1972 (16 USC 1361 et seq.).

**Page 7 2.2. Analysis Area** *“It is estimated that there are about 14 miles...”* This sentence was copied into this paragraph twice.

**Page 13 3.2.1 Threatened, Endangered and Forest Service Sensitive Listed** *“The remaining three species (humpback whale, Steller sea lion, and black oystercatcher) may occur outside of the analysis area, but within the adjacent marine waters of Carroll Inlet”* Black oystercatchers are not suspected to occur within Carroll Inlet as they prefer more exposed outer coastal conditions (S. Heintz - ADF&G, email).

**Page 14&15 Table 2** The Alaska T&E list was updated by NMFS in March 2013 and by FWS in May 2013. See either website for links to the updated list.

**Page 18 3.2.3 Migratory Birds** *“This list was derived from Boreal Partners in Flight (1999) and FWS (2002) species of concern lists”* FWS updated their list in 2008.

**Page 18 3.2.3 Migratory Birds** *“Table 4 Birds of Continental Importance Potentially Occurring in the Analysis Area”* Suggest adding any species that has habitat that would be impacted by the dam expansion.

**Page 19 3.2.4 Endemics** *“Table 5 and narrative”* The Revillagigedo Island southern red-backed vole *Myodes gapperi solus* should be included.

**Page 25 4.2.1 TES Wildlife Management Requirements and Mitigation Measures for TES Wildlife** *Avoidance of impacts to productive old-growth resulting from increase in pool elevation would not be feasible. Trees that require removal within the activity area will follow Forest Plan Standards and Guidelines as well as BMP....*This paragraph does not address TES Wildlife. By referencing the Forest Plan, it implies that trees on NFS lands will be harvested.

## **Appendix H: Botany and Wetlands Study Report**

**Page 5 1.4.1.2 Wetland Resources Land Use Activities** *“Consult with the Corps early in the planning process to determine whether a 404 permit is required.”* Early contact with the Corp may identify additional study needs.

**Page 8 2.3.1 Sensitive and Rare Plants** *“Populations of two rare plant species were identified and mapped as a result of field surveys....Additionally, two plant species not included on the 2012 AKNHP Rare Vascular Plant List but considered species of interest for the Tongass National Forest were observed ...”* Attachments 6 and 7 do not include information on observed populations of *Malaxis paludosa*, *Asplenium trichomanes L. ssp. trichomanes*, *Asplenium trichomanes-ramosum*, *Selaginella wallacei*, and *Hypericum anagalloides*, all of which are discussed under Section 4.2 - Identified Issues and Concerns for Rare Plants. Please include field data for these species occurrences in the study report.

**Page 13 3.5 General Vegetation Types Table 3** The Forest Service looks forward to having information pertinent to NFS lands separated out in future NEPA documents.

**Page 15 3.6 Invasive Plants** *Surveys for Invasive plants were conducted for this project in conjunction with surveys for Sensitive and Rare plants (August 6 to August 10, 2012).* According to Attachment 1 Response to Agency Comments, invasive species were documented and mapped below the dam. Please include the field data in the study report, along with any issues and concerns regarding invasive plants. Presenting results of the invasive field survey should not be deferred until the NEPA invasive species risk assessment is completed.

**Page 20 4.1.4 Large Yellow Lady’s Slipper Orchid (Cypripedium parviflorum Salisb. var. pubescens (Willdenow) O. W. Knight)** *The project would have no direct or indirect effects to potential habitat of large yellow lady’s slipper orchid because very little potential habitat for this species (peatlands on calcareous substrates) occurs within the analysis area...The risk of adverse effects to this plant is low, as no suitable habitat is present in the analysis area.* Please reconcile the statements regarding “very little potential habitat” and “no suitable habitat.” If there is potential habitat in the analysis area and it was not surveyed, then direct or indirect effects are possible.

**Page 28 4.5.1 Old Growth Forest** *Although unlikely, due to the lack of invasive plant species currently present....all old growth in the analysis area would be lost.* See comment Page 75 5.6.2.4 Old Growth Forest

**Page 29 4.5.2 Young Growth Forest** The study report states: *“It is assumed that all young growth within the analysis area (approximately 4.6 acres) would be lost.”* Figure 3 (Vegetation Communities map) on page 14 appears to show that no acres of young growth forest occurring on NFS lands would be inundated. However, it is difficult to make that determination based on the resolution of the map provided. If any potentially inundated NFS lands are forested with young growth, please clarify by providing an estimate of those acres. This area should be cruised as a separate stratum during the timber cruise, and its value assessed prior to a settlement agreement.

**Pages 29-30 4.6 Management Requirements and Mitigation Measures for General Vegetation**

*“Approximately 26 acres have been identified in the Lost Creek area, which were not part of the original conveyed lands and that additional ground surveys determined the 350-foot contour extending further upstream. The entirety of this area is owned by the USDA Forest Service.*

*Avoidance of impacts to productive old-growth resulting from the proposed 15-foot increase in pool elevation; however, would not be feasible. Trees that require removal within the activity area (i.e., between 330 feet and 350 feet) will follow Forest Plan Standards and Guidelines as well as BMPs.”* Please continue to reiterate that timber on NFS lands will not be cut. By referencing the Forest Plan, the statement implies that trees on NFS lands will be harvested.

**Page 30 4.6 Management Requirements and Mitigation Measures for General Vegetation** *“...within the Tongass National Forest, there will be no timber removal. A cruise would be conducted .....and a settlement with the USDA Forest Service will be concluded.”* The following should be determined for the settlement agreement with the USDA Forest Service:

- Acres of affected (inundated) old-growth on NFS lands.
- Acres of affected (inundated) young-growth on NFS lands.
- Timber volume (gross and net) and grade, by species, within those affected acres.

**Appendix I: Cultural Resources Study Report**

No comments. Either the Final Study Report incorporated our comments or the forthcoming Draft Resource Report and PDEA will address our concerns.

**General Comments for Future Documents**

Although not on National Forest System lands, the parcel below the dam, Lot 1 of U.S. Survey 11630 should be included in the analysis. The Forest Service recommends Lot 1 and 2 be included within all resource analysis areas as they are within the FERC boundary and activity will occur within each parcel. Consider documenting the existing condition and effects on all resources.

SEAPA states it will address Forest Service comments made during past Study Plan reviews during the NEPA process. The Forest Service looks forward to reviewing the Draft Resource Reports and PDEA to determine if our comments were adequately addressed.

In addition, please note and address the following in future documents:

- Dolly Varden char are a TNF MIS
- Threatened and Endangered Species (Fisheries). See 2008 TLRMP FEIS page 3-75
- Subsistence, especially eulachon
- Invasive Plant Species as a separate section in Botany
- The 26 acres of NFS lands within the FERC boundary are within an Inventoried Roadless Area and are likely subject to the Roadless Rule. Please include a section to address this in the PDEA. The Forest service can provide examples and suggested wording.

Lastly, during the May 22, 2013 public meeting, an individual suggested that Alexander Archipelago wolves are found only on Prince of Wales Island and that Revilla wolves are a different subspecies. Research on wolf genetics and populations is on-going, but currently, the Forest Service considers all wolves on the Tongass NF to be Alexander Archipelago wolves.