



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

November 11, 2003

Ms. Margalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

RE: Comments on Scoping Document 1 (SD1), Blue Lake Hydroelectric Project, FERC No. 2230

Dear Ms. Salas:

The National Marine Fisheries Service (NMFS) has reviewed the SD1 document for the Blue Lake Hydroelectric Project. We also attended the scoping meeting held on October 22. Our written comments on SD1 follow.

Fisheries Issue Identification:

The list of fisheries issues for analysis should include the waterfall at stream mile 0.84, which may be a barrier for anadromous fish. Instream flow reduction due to the hydropower operations may increase the barrier effect of the waterfall. NMFS understands that a Powers and Osborne (1985) analysis of the waterfall as a fish barrier is planned by the applicant for the summer of 2004.

Impact Baseline and Reference Condition:

Page 22 of SD1 discusses the concept of an "impact baseline." The definition given should be reviewed by the Federal Energy Regulatory Commission (FERC) to ensure that it is accurate. In addition, NMFS recommends that the term "reference condition" be used to represent conditions of the stream and its resources prior to construction of the Blue Lake dam. The reference condition is an important concept in assessing the potential of the Blue Lake watershed for fishery production and overall ecological health. The "reference condition" should be used in evaluating cumulative impacts, as required by the National Environmental Policy Act, including past, present, and future actions and their effects on aesthetic, recreation and fisheries resources.

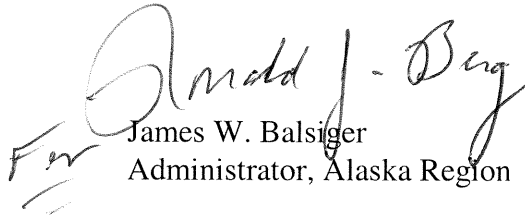


Proposed Protection and Enhancement Measures:

Based on results of a limiting factor analysis for fisheries resources in Sawmill Creek, and a Powers and Osborne salmon barrier method (1985) analysis of the waterfall at stream mile 0.84, enhancement measures for Sawmill Creek should be investigated in the NEPA document. Such measures may include, but are not limited to, design of a fish passage structure at the waterfall, creation or improvement of spawning gravels, and creation of side channel habitat for juvenile salmonid summer rearing and overwintering.

We look forward to continuing to work with you on this project through the Alternative Licensing Process. Linda Shaw is our contact for this project, and can be reached at (907)586-7510.

Sincerely,

A handwritten signature in cursive script that reads "James W. Balsiger". The signature is written in dark ink and is positioned above the printed name and title. To the left of the signature, there are some faint, illegible handwritten marks.

James W. Balsiger
Administrator, Alaska Region

LITERATURE CITED

Powers, P.D., and J. F. Orsborn. 1985. Analysis of barriers to upstream fish migration: An investigation of the physical conditions affecting fish passage success at culverts and waterfalls. Final Report 1984 (Project No. 82-14). Portland, OR: U.S. Department of Energy, Bonneville Power Administration, Division of Fish and Wildlife. Xiii +120pp.

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