



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration**

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

September 6, 2002

Mr. Corry Hildenbrand
Lake Dorothy Hydro, Inc.
5601 Tonsgard Court
Juneau, AK 99801-7201

RE: Lake Dorothy Hydroelectric Project, FERC No. 11656
Dolly Varden Habitat Evaluation Data Report and
Lower Dorothy Creek Brook Trout Habitat Evaluation
of July, 2002

Dear Mr. Hildenbrand:

Thank you for the opportunity to review the referenced documents. The National Marine Fisheries Service (NMFS) offers the following comments.

Lower Dorothy Creek Dolly Varden Habitat Evaluation Data Report

This report thoroughly describes the severely limited, marginal habitat available for spawning, rearing or overwintering Dolly Varden char in lower Dorothy Creek, and documents the nature and location of upstream barriers to fish passage. Thorough minnow trapping and snorkel investigations of lower Dorothy Creek have resulted in the capture of only one subadult Dolly Varden char. Snorkel surveys have documented the lack of spawning gravels, large wood and other necessary habitat features which would allow char to survive in the channel. Flow measurements have characterized the channel as a glacial torrent with summer flows exceeding 1000 cfs and winter icing conditions creating minimal flows. Flows of these velocities would not allow char to remain in the channel for longer than transient periods, and barriers to fish passage prevent upstream migration to more hospitable habitats.

NMFS agrees with the U.S. Forest Service that this habitat evaluation justifies maintaining only the minimal flows necessary to provide for continuity between pools. We concur with the recommendation to maintain minimum flows of 6 cfs in the reaches of lower Dorothy Creek that are accessible to



anadromous fish. We also agree with the U.S. Forest Service that this project may improve spawning habitat by reducing flows during the high-flow summer months. These reduced flows could slow the rate at which gravels are flushed out of the creek and allow spawning gravels and wood to accumulate.

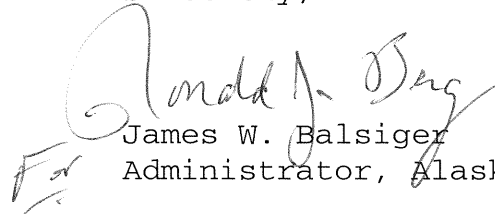
We recommend that the licensee conduct Tier 1 habitat surveys every five years once Phase I of the project reaches full capacity. The intent of these surveys is to ensure that habitat degradation through increased siltation of any improved spawning habitat is not occurring. If habitat improves and the channel becomes capable of supporting viable populations of Dolly Varden or other anadromous species, we recommend as a mitigation measure that periodic channel-forming flows be released to prevent continued silt deposition.

Lower Dorothy Creek Brook Trout Habitat Evaluation

As we stated at the August 26, 2002 meeting, NMFS has no jurisdiction over resident fish and no policy on preservation of non-native introduced resident fish species.

Please contact Sue Walker (Marine Resource Specialist, Habitat Conservation Division, 907-586-7646 or susan.walker@noaa.gov) with any questions or comments regarding this project.

Sincerely,



For

James W. Balsiger
Administrator, Alaska Region

cc: ADF&G, Douglas, Clayton Hawkes*
ADF&G, Douglas, Kevin Brownlee,*
USFWS, Juneau, Richard Enriquez,*
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