



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 21668

Juneau, Alaska 99802-1668

February 16, 2005

Richard H. Levitt, President
Gustavus Electric Company
P.O. Box 102
Gustavus, Alaska 99826

Dear Mr. Levitt:

Thank you for providing us with copies of the Falls Creek Hydroelectric Project (FERC#11659) resource and design plans for comment. We have reviewed the six plans sent (Construction Period Environmental Compliance Monitoring Plan, Water Quality Monitoring Plan, Biotic Monitoring Plan, Wetland Mitigation Plan, Road Management Plan and Public Access and Recreation Plan) and offer the following comment.

Section 4 of the Biotic Monitoring Plan, "Monitoring the Anadromous Reach", notes that "High suspended sediment levels can be abrasive to delicate gill tissue of newly emerged fry, and young coho avoid turbidities in the 25 to 50 NTU range (Bjorn and Reiser 1991)." In the Water Quality Monitoring Plan, in Section 4, "Turbidity Monitoring Schedule", daily monitoring is prescribed for various sites from the initiation of construction until 60 days following removal of temporary erosion control structures. The plan further states that "If turbidity measurements at the downstream sites exceed 25 NTU greater than those at the upstream sites, then related construction activities will cease immediately, the sediment sources located, and the appropriate sediment control measures implemented and monitored for effectiveness."

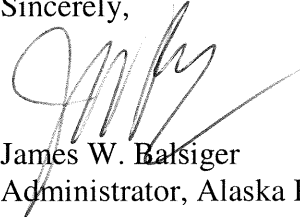
As currently written, the plan would allow for potentially harmful turbidity levels to occur, because project-related turbidity would be additive to undefined upstream turbidity readings. We understand that Falls Creek Hydroelectric Project would not want to be accountable for turbidity stemming from non-project related sources, yet we are interested in ensuring that the project does not contribute to total turbidity levels that exceed suitable conditions for anadromous salmon. In other words, if non-project related conditions exceed 25 NTU, Falls Creek Hydroelectric Project should not allow for another 25 NTU of turbidity before taking action to avoid or reduce additional sediment input. The project action should not add to the total turbidity in Falls Creek if non-project related levels meet or exceed 25 NTU. Therefore, the National Marine Fisheries Service recommends that you alter the plan to read "The project will not contribute to turbidity levels such that total stream turbidity levels exceed 25 NTU. If turbidity measurements at the downstream sites meet or exceed 25NTU as a result of project related construction activities, then related construction activities will cease immediately, the sediment sources will be located, and the appropriate sediment control measures will be implemented and monitored for effectiveness. Construction activities may proceed if



they do not add any turbidity to the creek in conditions where non-project related sources of turbidity levels are 25NTU or above.”

If you have any questions, please contact Linda Shaw at (907) 586-7510.

Sincerely,



James W. Balsiger
Administrator, Alaska Region

Cc: Richard Enriquez, USFWS*
Kevin Brownlee, ADF&G*
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