

Appendix E. Summary of Responses to Comments on the Draft Report

Summary of responses to comments on the draft report for the Terrestrial Vegetation Study.

Date of Letter/Email	Commenting Party	Comment / Study Request	Chugach Response / Report Changes
4/30/04	USFS	One analysis that we requested for several studies on Cooper Reservoir was to model habitat use and availability at a static reservoir level with established vegetation around the shoreline. This information is needed to provide a reference point for describing the effects of the Project that will be continuing into the future for your Proposed Action. ... We are not proposing that the static reservoir level be used as the “No Action” alternative in FERC’s NEPA analysis.	Chugach notes that all of the studies were conducted consistent with the final study plans and believes the reports do fully describe the ongoing effect of reservoir operations on the resources of interest. Chugach has also summarized in the Initial Consultation Package and Draft License Application all historical information of which it is aware, to qualitatively describe pre-Project conditions. Nevertheless, to address the continuing interest from participants, Chugach has included in the applicable final reports additional discussion using data collected during the 2003 studies to describe conditions that would likely exist if the reservoir level were held “static” at about 1,168 feet msl. [See additional discussion at p. 23 in final report.]
4/30/04	USFS	The discussions of the results in several of the reservoir studies do not respond to our request for habitat evaluations under differing operating scenarios. Specific studies are Cooper Lake fish, Macroinvertebrates, Terrestrial Wildlife, and Water Birds.	Chugach no longer proposes any change in the existing operating regime of Cooper Lake, so did not analyze potential effects of alternative operations. However, the necessary data to analyze the potential effects of an operating range up to 1,206 feet msl were collected as described in the study plans. Although no detailed analysis of these data will be conducted at this time, the final reports have been modified to include a brief, qualitative description of how an increased normal reservoir operating level could have been expected to affect vegetation, fish, and wildlife resources, as applicable. [See additional discussion at p. 23 in final report.]
4/30/04	ADFG	No data or results for the site-specific fieldwork were reported, making it difficult to estimate existing conditions, evaluate project impacts, or provide plausible predictions of vegetation response to	Site-specific field data were collected at 167 different locations during the 2003 survey season. Refer to Table 3 in the Terrestrial Vegetation

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		existing or proposed alternatives. Likewise, it was not clear how the field data was used to modify or ground-truth the GIS-based model.	Study report for a summary of data categories that were sampled at each site. Locations of each field survey site (denoted as “data form locations” on the maps legend) are shown on the vegetation mapping figures included in Appendix B of the report. A breakdown of the number of field survey sites and data form identification numbers for each mapped cover type are included in the “Mapping Code” sections of each cover type description in the Results section of the report. [No changes to report in response to this comment.]
4/30/04	ADFG	Site-specific vegetation sampling provides an opportunity to integrate efforts with the Terrestrial Wildlife studies. For this reason, ADF&G requested that observations of wildlife use (pellets, tracks, browsing, etc.) be recorded during plant surveys. However, we did not see any of this data presented.	Site-specific field observations of wildlife use were collected and shared with the terrestrial wildlife study. Furthermore, the assessment of habitat characteristics was a collaborative effort between the wildlife study and the vegetation study. The site-specific data collected was not presented in the report for brevity purposes. Refer to page 12 in the terrestrial vegetation study under Task 2, item c for a brief summary of information that was noted on terrestrial vegetation field data forms completed during the 2003 survey season. [No changes to report in response to this comment.]
4/30/04	ADFG	No specific conclusions can be made about changes in vegetation from proposed project alternatives without field data. Predicted changes in vegetation due to higher flow volumes are not consistent with the scientific literature and other studies conducted in the region.	Field data were collected at 167 different locations during the 2003 survey season. All field data form locations are shown on the mapping figures included in Appendix B of the Terrestrial Vegetation Study report. Chugach is not aware of any scientific studies that contradict the conclusions of this report, but would appreciate having any such study specifically identified so that the findings can be taken into consideration. [No changes to report in response to this comment.]

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4/30/04	USFS	This study follows the Forest Service study plan, and Table 1 provides a good summary of previous mapping and inventory efforts in this project area to date. The study does not mention the proportion of exotic species in the transmission line corridor. We request that the study provide a cross reference to the Exotic Plants Study explaining that the disturbance communities found in the transmission line corridor are not natural vegetation.	Comment noted. We concur with this suggestion and have provided a cross reference to the Exotic Plants Study in the Terrestrial Vegetation Study report. [See added text at p. 19 (Forb Cover Type, General Characteristics, 4 th sentence), and p. 27 (Project Effects on Vegetation along Powerlines and Around Other Structures, 2 nd to last sentence)]

Note:

1. ADFG = Alaska Department of Fish and Game. USFS = USDA Forest Service (Chugach National Forest).