



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Ecological Services Anchorage  
605 West 4th Avenue, Room 61  
Anchorage, Alaska 99501-2249

## RECEIVED

FEB 19 2003

CHUGACH ELECTRIC  
CLPP Relicensing Project

reply to AFWFO

Mr. Burke Wick  
Cooper Lake Relicensing Project Manager  
Chugach Electric Association, Inc.  
5601 Minnesota Drive  
P.O. Box 196300  
Anchorage, Alaska 99519-6300

FEB 19 2003

RE: Cooper Lake Hydroelectric Project, FERC No. 2170  
Comments on the Road and Access Route Condition Survey Draft Study Plan

Dear Mr. Wick:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to review the Chugach Electric Association's January 17, 2003, Road and Access Route Condition Survey: Draft 2003 Study Plan. Our comments are detailed below.

#### *Areas Surveyed*

We request that a map of the roads and access routes to be included in the study be presented in the final study plan. Please provide an overlay of the roads to be surveyed over a current (1998 or later) aerial photograph or digital orthophoto of the project area. The extent of the study area, and the proportion of total project-related road area that is on U.S. Forest Service land, is difficult to envision without a map. Please clarify what proportion of the total length of roads and access routes associated with the project will be surveyed for this study.

#### *Methodology*

The survey protocols and data collection parameters should be presented clearly in the study plan. While the parameters to be observed and data elements are presented in the appendix, the actual study methods are not described. Instead the reader is referred to a USFS technical document (FSH 7709.58 - Transportation System Maintenance Handbook: Region 10 Supplement No. 7709.58 -2002-1), upon which the methods of the current study will be "based" (p. 4 para. 2). One way to present the study methods definitively would be to include the technical document as an additional appendix to the study plan and note any deviations from the specific methodology presented in the technical document. Another way to present the study protocols would be to summarize these methods in the methods section of the study plan. It is impossible for us to comment on the methodology until it is presented for review. Therefore, we reserve the right to request further study if the final study plan presents methods we believe are inadequate to accomplish the study objectives.

*Wetlands Mapping*

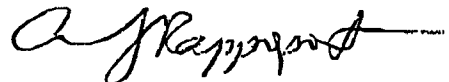
We request that the study report include a map of all wetlands crossed by the power line and/or access roads within the project boundaries. Digital National Wetland Inventory (NWI) maps may be obtained free, off the internet at [www.nwi.fws.gov](http://www.nwi.fws.gov). For additional information please contact Bill Pearson, our NWI Coordinator at 907-786-3471. The U.S. Army Corps of Engineers can provide a jurisdictional determination for any wetlands in the vicinity of new road or power line fills, which may require a permit under section 404 of the Clean Water Act.

*Stream Mapping*

We request that the study generate a map of all streams crossed by the power line and/or access roads within project boundaries. Location and general condition of all culverts (including height of culvert outlet above the stream) should be noted during the survey, as well as whether these streams are anadromous and fish are able to successfully travel upstream of any road crossings.

In advance, thank you for your attention to the issues detailed above. We look forward to our continued coordination with Chugach Electric Association throughout the relicensing process. If you have questions about these comments, please contact Mari Reeves 907-271-2785.

Sincerely,



Ann G. Rappoport  
Field Supervisor

Enclosure

cc:

Marcia Combes, United States Environmental Protection Agency, Anchorage, AK  
Tom Chapple, Alaska Department of Environmental Conservation, Anchorage, AK  
Lance Trasky, Alaska Department of Fish & Game, Anchorage, AK  
Ken Lord, Solicitor, Anchorage, AK  
Jeanne Hanson, National Marine Fisheries Service, Anchorage, AK  
Dave Blanchet, Chugach National Forest, Anchorage, AK