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**CHUGACH ELECTRIC
CLPP Relicensing Project**

Date: January 24, 2003
Memo To: Vince Yearick
From: David Turner
RE: Cooper Lake Hydroelectric Project (FERC 2170) study plans

I have reviewed the Terrestrial Wildlife Study: Draft 2003 Study Plan (November 15, 2003); Terrestrial Vegetation Study: Draft 2003 Study Plan (November 27, 2003); Cooper Lake and Cooper Creek Waterbirds Study: Draft 2003 Study Plan (November 15, 2003); and Sensitive and Exotic Plants Survey: Draft 2003 Study Plan (November 27, 2003). I have no specific comments on the waterbird survey plan and the sensitive and exotic plants survey plan.

As a general comment on all the plans, I question whether the transmission line from the Quartz Creek substation to Anchorage is within the Commission's jurisdiction. I recommend that Chugach Electric Association, Inc. review the Commission's regulations defining project transmission lines (Section 3(11) of the Federal Power Act and Subpart H, §4.70 of the Code of Federal Regulations, Title 18) and the Commission's guidance document "Identifying Transmission Facilities at FERC Hydroelectric Projects" Paper No. DPR-6 (January 1993) to determine which transmission lines fall within the Commission's jurisdiction. Chugach Electric Association may want to consider removing the facilities from the project license (if they are already included-I have not checked on this) before expending resources on various studies associated with this transmission line.

Terrestrial Vegetation Study

In Task 5 of the Vegetation and Habitat Evaluation (section 5.0), Chugach Electric intends to overlay mapped plant community boundaries onto 2-foot contour maps to determine the area of shoreline plant communities potentially affected from proposed changes in reservoir operations. From the information provided I cannot determine if mapping of vegetation at a minimum scale of 2 acres will be sufficient to characterize and show predicted changes in the vegetation communities from proposed changes in reservoir elevations. Chugach Electric should explain why this scale is expected to be sufficient to accomplish the analysis defined in Task 5.

In Task 2 of the Wetland Assessment (section 8.0), Chugach Electric states that it would focus its formal wetland delineation efforts on "marginal sites" and about 12 sites would be

fully documented. Explain how this number of sites was derived and why it would be sufficient?

Terrestrial Wildlife Study

On page 2, the Cooper Lake Reservoir study area is defined as 50 feet beyond the upper level of historic inundation. Staff assumes that this coincides with the vegetation mapping: 50 feet beyond the licensed normal maximum reservoir elevation of 1,210 feet msl around Cooper Lake.

On page 6 (survey methods), Chugach Electric should describe how it will determine how many transects per habitat type will be completed. Similarly, it should describe how it will determine how many point count stations will be completed.

On page 7 (survey timing), Chugach Electric states that surveys would be completed during the first week of May... This should be the last week of May to be consistent with the effort described on page 6 (1st paragraph).

On page 7-8 (survey timing), Chugach Electric indicates that wildlife surveys will be conducted beginning the last week of May and extending through July. This period would identify important nesting and rearing periods for a variety of wildlife. ADFG raised concerns regarding icing and migration along the reservoir associated with reservoir fluctuations and the proposed reservoir changes. Chugach Electric should explain how it intends to analyze project effects on wildlife habitat use by moose, bears, wolves, sheep and other important species during the fall and winter. If existing information is not sufficient to describe the value of habitats surrounding Cooper Lake and Cooper Creek during the periods, additional survey efforts may be needed.

On page 9 (results reporting), Chugach Electric states that the report will discuss project operations. This discussion should include a description of project transmission line and road maintenance practices, including frequency of occurrence of these practices and the types of equipment involved.