Memorandum

To: Michael Sale, Senior Technical Advisor, LIHI

From: Jeffrey Cueto, P.E.

Date: February 2, 2017

Re: Goat Lake Hydroelectric Project – LIHI Certificate #26
Recertification Request

This memorandum contains the results of my review of the recertification request for the Goat Lake Hydroelectric Project (Project), located on U.S. Forest Service[1] lands in southeast Alaska. It is owned by Alaska Power & Telephone Company (AP&T). LIHI publicly noticed the application for recertification on August 5, 2016, with comments due by October 5, 2016. No comments were filed in response to this formal notice.

Fred Ayer, former LIHI Executive Director, did the original review for certification of the Project in 2007, and the Board certified it for a term of five years (through October 23, 2011). No special conditions were imposed. The Project was recertified by letter dated July 15, 2012 after a determination of no material changes that would affect the LIHI criteria and the absence of any changes to those criteria in the intervening five years. The certification term was extended through October 23, 2016, and more recently through March 31, 2017 to accommodate the recertification application review.

I. Recertification Review Standards.

Beginning in 2016, LIHI reviews new applications, both initial applications and recertification applications, under a revised set of criteria and an updated process, all outlined in the Low Impact Certification Program 2nd Edition Handbook (March 7, 2016). Section 6 of the Handbook addresses the recertification process, which is comprised of two stages. Under Stage I, LIHI can expeditiously recertify a project if it has a complete application and finds that there is neither a material change in the criteria or process or a material change in the facility that may affect conformance with the criteria. If a material change determination is made, then the application moves to Stage II for a full review under the criteria. Since the Project has not previously been subject to review under the new Handbook criteria and because that fact alone constitutes a

[1] The Forest Service granted a special use permit on September 4, 1996, and the Project became operational the following year.

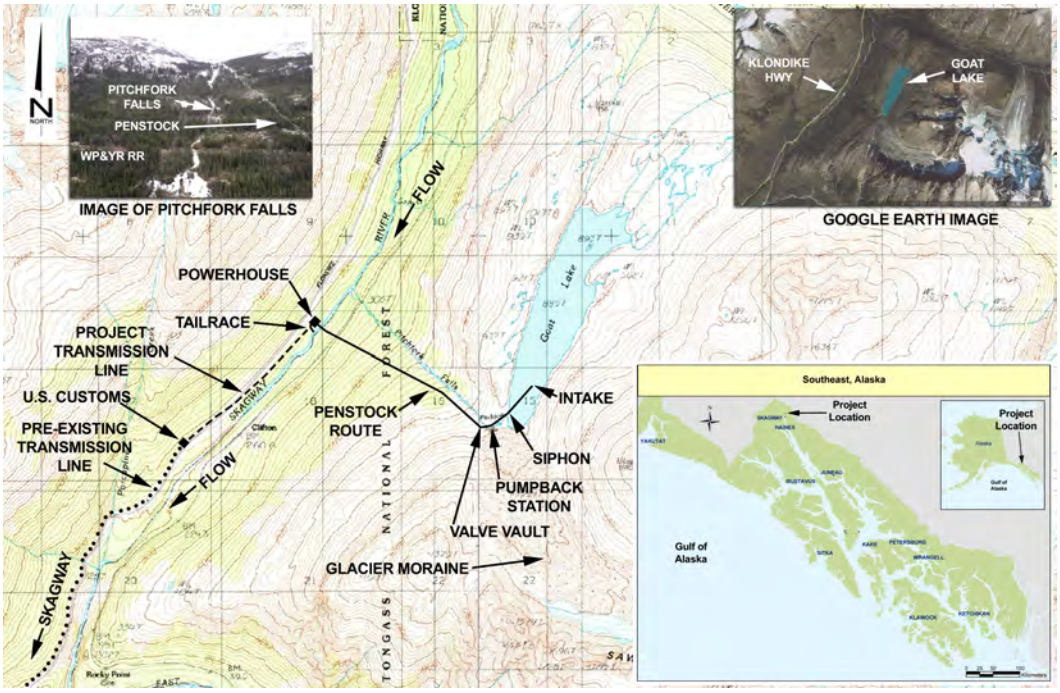

Figure 1. Project location and layout.

material change, the application is subject to a Stage II full review under the revised criteria. The scope of review as described in the Handbook is:

> The Stage II recertification review involves a complete review of the application package, a search of public records associated with the facility, and all other necessary inquiries (e.g., to resource agencies and local non-governmental organizations) to resolve factual disputes, evaluate the veracity of claims, or make other inquiries as needed. The application reviewer also reviews and summarizes all public comments received.
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> …
>
> At the conclusion of the full, Stage II review, the application reviewer will produce a detailed reviewer's report similar to that issued for an initial certification and make a recommendation to the Executive Director as to whether LIHI's criteria are still met by the facility, in light of the material change and/or the change in LIHI's criteria or interpretation.

II. Summary Recommendation.

The Project is materially the same facility as was licensed on July 15, 1996 and developed in 1997, except for relatively minor changes in the bypass flow schedule, further discussed below. Because the project occupies land of the Tongass National Forest, the federal license (FERC Project No. 11077) includes requirements prescribed by the U.S. Forest Service by letter dated June 17, 1996 (articles 101-112). The Alaska Department of Environmental Conservation waived jurisdiction under Section 401 of

the federal Clean Water Act by letter dated October 3, 1994. Consequently, there are no mandatory conditions related to a water quality certification.

Based on my review of the record, including the original LIHI reviewer report from 2007, the 2011 recertification reviewer report, and the files contained in FERC eLibrary and entered subsequent to the last recertification review, AP&T has an excellent track record with respect to compliance with the terms of the federal license. I solicited comments from several state and federal agencies, and the comments received from the U.S. Fish and Wildlife Service, the Alaska Department of Fish and Game, and the Alaska Department of Natural Resources are appended. No new issues were raised in those comments, nor were any recommendations made for project changes.

Given these facts and my review under the present criteria (summarized below), I recommend that the Project be recertified for the standard term of five years with no special conditions attached.

III. Standards Review

Criterion A - Ecological Flow Regimes

Goal: The flow regimes in riverine reaches that are affected by the facility support habitat and other conditions suitable for healthy fish and wildlife resources.

Review: The facility cycles flows using Goat Lake, a natural alpine lake, functionally as a storage reservoir with a drawdown of up to 40 feet. There is no dam. Penstock withdrawals are via a deep siphon intake. To capture additional water, a pump station is located 300 feet downstream to intercept outflows from a glacial moraine and pump it to the lake. The penstock bypasses Pitchfork Falls Creek for the full length of about 6,200 feet from the lake to the Skagway River. The generating station discharges directly to the Skagway River downstream of the confluence with Pitchfork Falls Creek.

A valve house at the lake contains a bypass pipe to provide seasonal flows that are required under the federal license (Article 105) in order to address aesthetics as the falls can be viewed from the Klondike Highway. The license requires a minimum of 8.5 cfs from June 1 – September 30[2] for 12 daylight hours each day; the discharge is controlled using a SCADA system.

[2] Article 105 originally required a 13 cfs daytime flow from May through September, with short term modifications allowed with the written consent of the Forest Service. Based on experience with naturally available flows and Forest Service viewscape objectives, the requirement was subsequently amended, with the latest change being the elimination of the last two weeks of May (amendment of Article 105 on January 14, 2014). AP&T reported this latest change to LIHI in its annual compliance statement. The original reviewer report goes into some detail about the reduction from 13 cfs to 8.5 cfs, allowable deviations, and Forest Service objectives.

Figure 2. Valve house discharging aesthetics flow to Pitchfork Falls Creek.

Figure 3. Pitchfork Falls frozen over.

No bypass flows are required for ecological support, nor are there any special flow constraints below the project tailrace to limit impacts to aquatic habitat due to artificial flow fluctuations. The Skagway River and Pitchfork Falls Creek apparently have limited habitat value. According to the FERC Final Environmental Assessment (May 1996, pp. 24-25):

> In April 1994, AP&T and the ADFG conducted a fish survey in the Skagway River upstream and downstream of the Pitchfork Falls outlet. During the survey, no fish were captured or observed. The survey report showed that existing habitat conditions are extremely poor because of the high gradient and lack of overwintering and rearing habitats. The survey results indicate that this section of the Skagway River does not support any significant fish populations (Alaska Power and Telephone Company 1995b).

Appended comments from the U.S. Fish and Wildlife Service and the Alaska Department of Fish and Game indicate that both Pitchfork Falls Creek, which descends 2,100 feet over its run from the lake to the Skagway River, and the Skagway River in this reach have limited or no value for the support of fish under natural flow conditions.

The Department of Fish and Game stocked Goat Lake with Arctic grayling in 1994, attempting to establish a sports fishery. The license required population and habitat surveys in order to determine whether lake drawdowns during the June-July spawning periods would limit tributary access. Studies completed between 2001 and 2007 indicated that drawdowns were not having a significant impact. However, Goat Lake is a low nutrient lake, and the introduction of grayling was deemed unsuccessful according to the appended Department of Fish and Game letter, which considered water temperature and lack of food as limiting factors.

Conclusion: The Ecological Flow Regime Standard A-2 (Agency Recommendation) is met in all three zones.

Criterion B - Water Quality

Goal: Water Quality is protected in waterbodies directly affected by the facility, including downstream reaches, bypassed reaches, and impoundments above dams and diversions.

Review: The waters affected by the Project are relatively pristine. Water quality studies completed during the licensing process suggested that no significant adverse impacts to water quality were likely to occur. Alaska's 2010 Listing of Impaired Waters does not include any waterbodies affected by the Project:

http://dec.alaska.gov/Water/wqsar/Docs/2010impairedwaters.pdf

Conclusion: The Water Quality Standard B-1 (De Minimis Effect) is met in all three zones as the change in water quality caused by the Project does not alter the physical, chemical, or biotic water characteristics necessary to support fish and wildlife resources or human water uses. Note that the diversion of virtually all flow from Pitchfork Falls Creek is, of course, a dramatic physical change, but it can be considered de minimis in this context as the impact on state-designated uses, including habitat, is minimal based on the available evidence.

Criterion C - Upstream Fish Passage

Goal: The facility allows for the safe, timely, and effective upstream passage of migratory fish. This criterion is intended to ensure that migratory species can successfully complete their life cycles and maintain healthy, sustainable fish and wildlife resources in areas affected by the facility.

Review: No migratory fish are affected by the Project. As indicated in the appended letter from the Department of Fish and Game, an anadromous fish barrier (a falls) is located about three miles downstream, and there is no significant riverine population of fish that could be adversely affected.

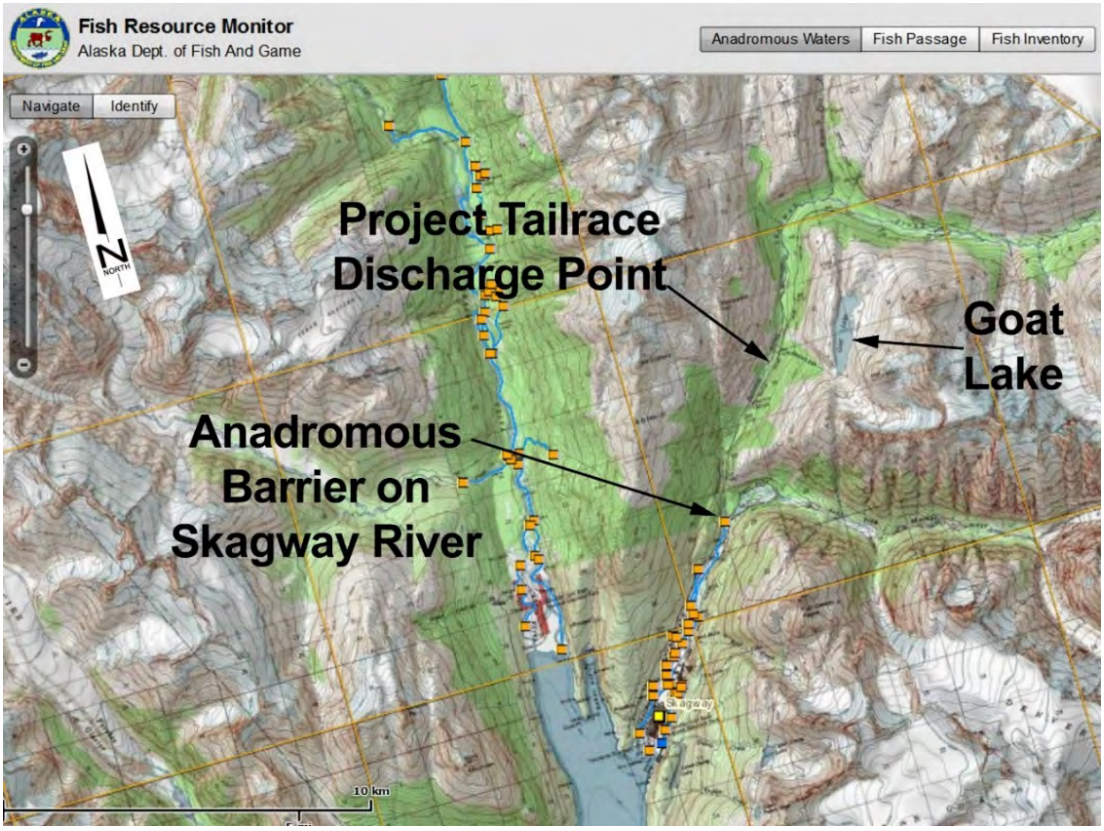

Figure 4. Location of natural anadromous fish barrier relative to the Project.

Conclusion: The Upstream Fish Passage Standard C-1 (Not Applicable) is met in all three zones. There are no migratory fish in the vicinity of the facility, and the facility is not the cause of extirpation of such species as they were not present historically.

Criterion D - Downstream Fish Passage and Protection

Goal: The facility allows for the safe, timely, and effective downstream passage of migratory fish. For riverine (resident) fish, the facility minimizes loss of fish from reservoirs and upstream river reaches affected by Facility operations. All migratory

species are able to successfully complete their life cycles and to maintain healthy, sustainable fish and wildlife resources in the areas affected by the Facility.

Review: The relevant facts are essentially the same as those for upstream passage.

Conclusion: The Downstream Fish Passage Standard D-1 (Not Applicable) is met in all three zones. Migratory fish are not present. The lake does not support a resident population of fish that could be entrained or impinged by the intake.

Criterion E – Shoreline and Watershed Protection

Goal: The Facility has demonstrated that sufficient action has been taken to protect, mitigate and enhance the condition of soils, vegetation and ecosystem functions on shoreline and watershed lands associated with the facility.

Review: The lake, Pitchfork Falls Creek, and the east shore of the Skagway River are Forest Service lands, and the Forest Service is on record as not wanting any recreational development. The west shore of the river is State land managed by the Department of Natural Resources; the powerhouse is located on the west shore.

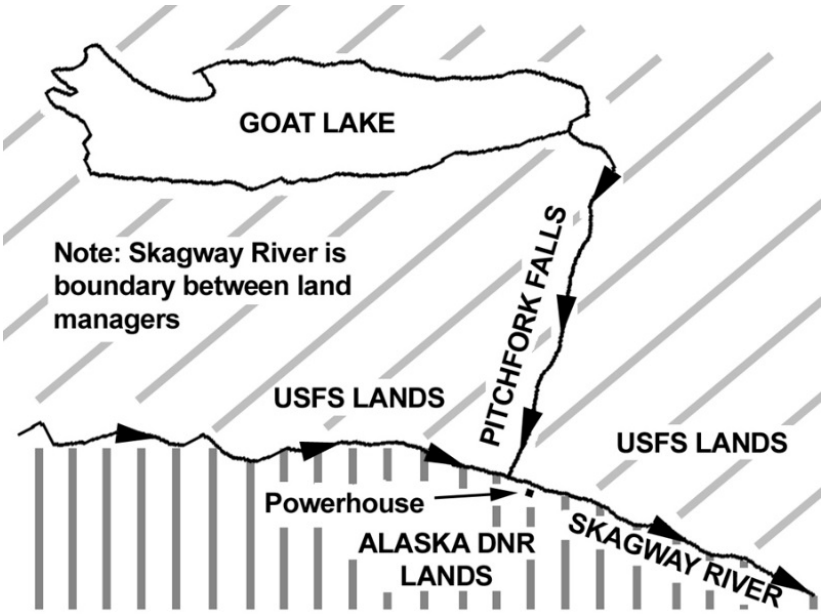

Figure 5. Land ownership/management at the Project.

Conclusion: The Shoreline and Watershed Protection Standard E-1 (Not Applicable) is met in all three zones. There are no lands associated with the facility under ownership and control of the applicant, and there are no shoreline management plans for the lake nor for the streams or similar protection required at the facility.

Criterion F - Threatened and Endangered Species Protection

Goal: The Facility does not negatively impact listed species.

Review: There are no listed species known to be present in the project vicinity, and there were none when the project was first constructed.

Conclusion: The Threatened and Endangered Species Protection Standard F-1 (Not Applicable/De Minimis Effect) is met in all three zones. There are no listed species present in the facility area or downstream reach, and the facility was not responsible for the extirpation of the listed species if they were previously there.

Criterion G - Cultural and Historic Resource Protection

Goal: The Facility does not inappropriately impact cultural or historic resources that are associated with the Facility's lands and waters, including resources important to local indigenous populations, such as Native Americans.

Review: A cultural resources survey of the project area was completed in 1994 as part of the licensing process. The survey identified the following cultural resources in the project area: (1) contributing elements of the Historic Landmark, that specifically include the WP&YR RR, a historic tourist trail and viewpoint of Pitchfork Falls, the historic Brackett Wagon Road, and a historic telegraph or telephone line dating from World War II and possibly earlier; and (2) the historic Canadian Oil pipeline dating from World War II. The Historic Landmark was listed on the National Register of Historic Places in 1962, and was established to preserve and interpret historical structures and other features of the Skagway area and the White Pass Trail, to the northeast, relating to the Klondike Gold Rush in the late 1890's and early 1900's No other cultural resources were located. Special measures were taken during design and construction were taken to avoid or minimize adverse impacts. The Project is subject to a MOA cultural resources management plan per Article 407 of the license.

Conclusion: The Cultural and Historic Resource Protection Standard G-1 (Not Applicable/De Minimis Effect) is met at Goat Lake as there were no resources identified in the vicinity of the lake outlet where intake facilities were constructed. For the lands impacted by the penstock, powerhouse, and transmission facilities, Standard G-2 (Approved Plan) is presumed to be met as there is no indication in the FERC record of non-compliance with the MOA cultural resources management plan.

Criterion H - Recreational Resources

Goal: The facility accommodates recreation activities on lands and waters controlled by the facility and provides recreational access to its associated lands and waters without fee or charge.

Review: There are developed recreational facilities at the Project. As discussed above, special flows are provided over Pitchfork Falls for viewing. The Forest Service manages the lands in a wild state for primitive recreational use.

Conclusion: The Recreational Resources Standard H-1 (Not Applicable/De Minimis Effect) is met in all three zones. While technically the standard is, *The facility does not*

occupy lands or waters to which the public can be granted access and does not otherwise impact recreational opportunities in the vicinity of the facility," it is my opinion that the Project to should be considered to qualify as it has a de minimis impact on recreational use. Since the lands are in public ownership with unrestricted access (except perhaps locally at the power facilities), I recommend applying H-1. The other standards do not fit the circumstances for this Project.

APPENDIX

From: Brockmann, Steve [steve_brockmann@fws.gov]
Sent: Monday, January 30, 2017 7:01 PM
To: Jeffrey Cueto
Cc: Jackie Timothy; Johnson, Shawn L (DFG); Glen Martin
Subject: Re: Goat Lake Hydroelectric Project

Jeff,
Staff of the U.S. Fish and Wildlife Service were involved with review of the Goat Lake Hydro Project during licensing in the late 1990s and early 2000s. We did not request instream flows in the bypass reach below the lake because there is no suitable fish habitat in the steep reach.

Our concerns focused more on access by (stocked) grayling to presumed spawning habitat in the inlet stream. Five years of monitoring by the applicant (2003 to 2007) suggests that as water temperatures rise and approach the temperature that triggers spawning, the lake also rises with snow melt, eliminating any potential barriers to fish access. Provided that the lake is not held at a stage that exposes fish migration barriers in the stream inlet during the spring, when spawning occurs, we believe that the Goat Lake Hydro Project will not unduly harm the grayling population.

We have no information on water quality in the system.

If you have any questions, please email or call me at (907) 780-1181.

Steve Brockmann
Southeast Alaska Coordinator
U.S. Fish and Wildlife Service

On Fri, Jan 13, 2017 at 4:27 AM, Jeffrey Cueto <ompompanoo@aol.com> wrote:
I know you've probably been busy and I expected a delay with the holiday season, but if I could get a response from you I'd sure appreciate it. If you would prefer discussing this project over the phone, I can give you a call next week.

Thanks.
Jeffrey Cueto, P.E.
for the Low Impact Hydropower Institute

On Dec 13, 2016, at 3:33 PM, Jeffrey Cueto <ompompanoo@aol.com> wrote:

All – I understand that GLH, Inc. sent each of you a letter last month asking that you provide the Low Impact Hydropower Institute (LIHI) with input on the resource impacts of the Goat Lake Hydroelectric Project. The project's LIHI certification as a "green" energy source expires soon, and I am under contract with LIHI to review the project for conformance with LIHI's newly revised process and criteria. I formerly worked for the Vermont Agency of Natural Resources as its hydropower coordinator and ran its federal Clean Water Act Section 401 certification program. More information on LIHI is available at http://lowimpacthydro.org/.

I'd like to clarify what the specific issues that were identified during the initial review and for which your input would be most helpful.

For new applications, LIHI uses a handbook available at http://lowimpacthydro.org/wp-content/uploads/2014/08/2nd-edition-handbook-20160307-FINAL-CLEAN.pdf.

Impact on stream ecosystem due to flow alteration: The first criterion relates to flow management. See pages 6-7 of the Handbook. Operation of the Goat Lake facility diverts virtually all flows from Pitchfork Falls Creek and affects flows in the Skagway River from the Pitchfork Falls Creek confluence to the dam and downstream of the station tailrace. Since there are no specific agency recommendations (as defined on pp. 42-43) for flow protection to support aquatic habitat, an argument could be made that Standard A-4 (Handbook, p. 7) applies to the bypassed reach if there is a scientific basis for not requiring a conservation flow. The application indicates that the precipitous character of Pitchfork Falls Creek has resulting in essentially no useable habitat for aquatic biota. Although the Standard calls for a "scientific study", it would seem sufficient if we had one or more opinions from resource managers familiar with the creek that the absence of habitat as described in the application is correct.

Water Quality: The second criterion relates to impacts on water quality and consistency with state water quality standards. The record does not indicate any specific conflicts, but it would be helpful to have a statement from the state water quality agency that the facility does not cause, or contribute to, non-support of designated uses for the affected waterbodies. Included would be concurrence that conservation flows in the bypassed reach and/or changes to flow cycling are not necessary to support fish and other aquatic biota as a use.

Any other input for the other criteria outlined in the Handbook would be appreciated.

If there are any questions, please feel free to contact me.

Responses directly to me would be fine, with copies to the applicant.

Thanks and have a great holiday season!

><{{{˚> ***Jeffrey R. Cueto, P.E.***
><{{{˚> (802) 223-5175
><{{{˚> ompompanoo@aol.com

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THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Fish and Game
DIVISION OF HABITAT
Southeast Region Office
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Juneau, Alaska 99811-0024
Main: 907.465.4105
Fax: 907.465.4759

January 25, 2017

Mr. Glen Martin
Alaska Power & Telephone Company
P. O. Box 3222
Port Townsend, WA 98368

RE: Goat Lake Hydroelectric Project, FERC Project No. 11077
Low Impact Hydropower Institute Recertification

Dear Mr. Martin:

Per your request, the Alaska Department of Fish and Game (ADF&G) Division of Habitat has reviewed the Low Impact Hydropower Institute (LIHI) recertification application for Alaska Power & Telephone Company's (AP&T) Goat Lake hydroelectric project.

In an email from LIHI dated December 13, 2016, Jeffrey Cueto, P. E. advised he was under contract to review the project for conformance with revised process and criteria and clarified it would be most helpful if reviewers addressed the project's impact on the stream ecosystem due to flow alteration and water quality. Maintaining fish habitat and providing fish passage fall within those criteria and within ADF&G's authorities at Alaska Statutes (AS) 16.05.841 and 16.05.871.

ADF&G stocked Goat Lake with Arctic grayling *Thymallus arcticus* in 1994, the same year AP&T filed a license application with the Federal Energy Regulatory Commission (FERC). We contacted the ADF&G Divisions of Sport Fish and Commercial Fisheries to find stocking records and historic information regarding the purpose in establishing the fishery and found no records exist.[1] ADF&G did not continue the stocking and did not monitor the fishery. Even so, AP&T considered the planted Arctic grayling during FERC licensing, conducted drawdown studies for Arctic grayling access to the inlet stream, and monitored the Arctic graying from 2001 – 2007.

[1] We contacted the federal fisheries biologist who participated in the Goat Lake Arctic grayling enhancement project and he stated in an email the purpose was a recreational fisheries enhancement opportunity and the fish were transported from a nearby lake. He provided a 1989 project summary describing his field crew introducing 6,330 pounds of gravel into 92 square yards of inlet streambed to improve spawning substrate in preparation for Arctic grayling introduction (Don Martin, Fisheries Program Manager, United States Forest Service Alaska Region 10, Juneau, personal communication). The 1989 Fish and Wildlife Project Summary can be obtained from Jackie Timothy, ADF&G Division of Habitat Southeast Regional Supervisor, Douglas, AK.

At the conclusion of monitoring, the ADF&G Division of Sport Fish Statewide Hydropower Coordinator commented it was a stocking experiment that didn't develop into a fly-in fishery as some had hoped, and suggested the Goat Lake cold water and lack of food appeared to be limiting factors to Arctic grayling survival.[2]

The outflow from Goat Lake is about 6,000 feet in length plunging 2,100 feet in elevation over a bedrock cascade to the Skagway River. The outflow, appropriately named Pitchfork Falls Creek, offers no useable fish habitat when wetted and is frozen solid in the winter.

The Skagway River has a barrier to anadromous fish about three miles downstream of the hydroelectric facility tailrace. ADF&G has not documented fish in the Skagway River above the anadromous barrier, or anadromous fish above the confluence of the Skagway River and Lillegraven Creek, a tributary about 1.5 miles downstream of the barrier. See the ADF&G online Fish Resource Monitor and the lack of data to support fish presence above the confluence at http://extra.sf.adfg.state.ak.us/FishResourceMonitor/?mode=awc.

Since there appear to be limiting factors to Arctic grayling survival in Goat Lake, no fish habitat exists in Pitchfork Falls Creek, and ADF&G has not documented fish use within a 4.5 mile reach downstream of the hydroelectric facility tailrace, ADF&G continues to find it unnecessary to incorporate an ecological flow regime to support fish passage and fish habitat for this project as specified by AS 16.05.841 and AS 16.05.871.

Sincerely,

Jackie Timothy
Southeast Regional Supervisor

Email cc:

Al Ott, ADF&G Habitat, Fairbanks
ADF&G Habitat Staff, Douglas
Rich Chapell, ADF&G/SF, Haines
Joe Klein, ADF&G/SF, Anchorage
Shawn Johnson, ADF&G/SF, Douglas
Jeff Nichols, ADF&G/SF, Douglas
Michelle Morris, ADF&G/CF, Juneau
Lorraine Vercessi, ADF&G/CF, Juneau
Clint Gundelfinger, ADNR/DMLW, Juneau
Don Martin, USFS, Juneau
Jeffrey Cueto, P. E., Vermont

[2] Jim Ferguson, ADF&G Division of Sport Fish Statewide Hydropower Coordinator, Anchorage, email message to Glen Martin, AP&T Project Compliance Manager, Port Townsend WA, December 10, 2007.

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Natural Resources
DIVISION OF MINING, LAND & WATER
Water Resources Section
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January 20, 2017

Mr. Glen Martin, Manager Permitting/Licensing/Compliance
Alaska Power & Telephone Company
P.O. Box 3222
Port Townsend, WA 98368

RE: Low Impact Hydropower Institute Recertification for the Goat Lake Hydroelectric Project

Dear Mr. Martin:

The Alaska Department of Natural Resources (ADNR), Water Resources Section has reviewed the Low Impact Hydropower Institute (LIHI) Recertification Application for the Goat Lake Hydroelectric Project (FERC Project Number P-11077) submitted by the Alaska Power & Telephone Company (AP&T) as the parent company of GLH, Inc., the operating affiliate of the project.

The potential impact areas described by the LIHI certification criteria fall under the management authority jurisdiction of multip e government agencies, both federal and state, and in some cases local. Although the LIHI certification criteria all represent different potential impact areas that are taken into consideration for State of Alaska authorization for water use under the Alaska Water Use Act (AS 46.15), the criterion most germane to the ADNR Water Section management jurisdiction regards flow regimes. For matters of water quality, fish and game habitat, cultural and historic resources, and recreation, there are other State of Alaska agencies and their associated management jurisdictions that these areas fall under.

The ADNR Water Resources section concurs with the "Alternative Standards Applied" designations and their associated "Supporting Information" regarding Criteria A "Ecological Flow Regimes" for all three Zones of Effect (Reservoir, Bypass Reach, and Powerhouse) submitted by GLH, Inc. The water use authorizations issued for the Goat Lake Hydroelectric Project (Permit To Appropriate Water LAS 19193 and Permit To Appropriate Water LAS 22488) mirror the amendments to Article 105 of the FERC license (P-11077) through conditions addressing required minimum flow releases to Pitchfork Falls (Zone of Effect #1,2) according to the following schedule:

Jun:	8.5 cfs	Aug:	8.5 cfs
Jul:	8.5 cfs	Sep:	8.5 cfs

It must be noted, however, that the above minimum flow release schedule is not to prevent any potential ecological impacts, but is designed to prevent any potential visual impact.

At this point the information we have indicates that these conditions are being met.

We also concur with the other "Alternative Standards Applied" designations and their associated "Supporting Information" regarding Criterion B, C, D, E, F, G, and H for all three Zones of Effect (Reservoir, Bypass Reach, and Powerhouse) submitted by GLH, Inc., but please note, and as stated above, the ADNR Water Resources Section does not have any direct management jurisdiction over those potential impact areas; to our knowledge any operational conditions that would apply to potential impacts falling under the B through H criterion are also being met.

Thank you for the opportunity to comment on GLH, Inc.'s LIHI recertification efforts.

Best regards,

Clint Gundelfinger
Natural Resource Specialist
Alaska Department of Natural Resources
Water Resources Section

USDA United States Department of Agriculture | Forest Service | Tongass National Forest Alaska Region

Juneau Ranger District
8510 Mendenhall Loop Road
Juneau, AK 99801
907-586-8800

File Code: 2770
Date: December 30, 2016

Glen Martin
Project Compliance Manager
Alaska Power & Telephone Company
PO Box 3222
Port Townsend, WA 98368

Dear Glen:

This letter provides a formal response from the Forest Service for your Low Impact Hydro Institute recertification.

In reviewing your permit file, Alaska Power & Telephone (AP&T) continues to consult annually with the Forest Service to ensure protection of the natural resource values in the project area as part of the permit terms and conditions. Forest Service staff have consistently conducted inspections at the site and took photos over the past decade. During those inspections some general site clean-up was requested, but no deficiencies were identified that demonstrated an impact on the surrounding environment.

Additionally, AP&T conducted a five-year monitoring project on a population of stocked grayling that showed the hydroelectric project was not impacting stream access for spawning.

Finally, AP&T continues to adhere to the minimum instream flow requirements to preserve the scenic quality of Pitchfork Falls from the highway.

If additional information is needed as part of your recertification process, please contact Jessica Schalkowski, Special Use Permit Administrator, at 907-789-6279 or jlschalkowski@fs.fed.us.

Sincerely,

Brad Orr

BRAD ORR
District Ranger