

Recreation Plan During Construction

For The
Gibson Dam Hydroelectric Project
FERC No. 12478-002

Dated
January 12, 2009

This Recreation Plan During Construction (Plan) was prepared by Gibson Dam Hydroelectric Company, LLC (Applicant) to identify potential impacts to recreational users in the Sun Canyon and to propose mitigation efforts to minimize such potential impacts during construction activities for the proposed Gibson Dam Hydroelectric Project (Project). Impacts may include noise and dust, impedance to trail use, effects to campground use, traffic delays and/or road closures, hazards from construction equipment, effects on areas available for fishing and hunting, and scheduled power interruptions to residences.

Figure 1 is an aerial photo intended to provide reference points to Project and recreation features near the dam as further discussed in the Plan. The majority of the work will occur in the vicinity of the dam as shown on the aerial photo. The Plan also discusses potential impacts to traffic, noise, and dust during transmission line construction along the approximate 5 mile route on National Forest Lands extending east from the dam.

This Plan specifically addresses nine features on Nation Forest Lands where recreational use may be impacted during construction of the proposed Project. The features are as follows:

1. Trail 201
2. Viewing Turnaround at FDR 8973
3. Beaver Trailhead
4. Blacktail corral
5. FDR 108
6. Home Gulch Campground
7. Home Gulch boat launch
8. Dispersed campsites
9. Watchable wildlife interpretive site

This Plan addresses potential use impacts and provides mitigation efforts to minimize impacts to the above listed features as they relate to the following recreational user groups:

1. General public
2. Homeowners on private land in Mortimer Gulch
3. Recreational residence owners on National Forest Land
4. Commercial outfitters

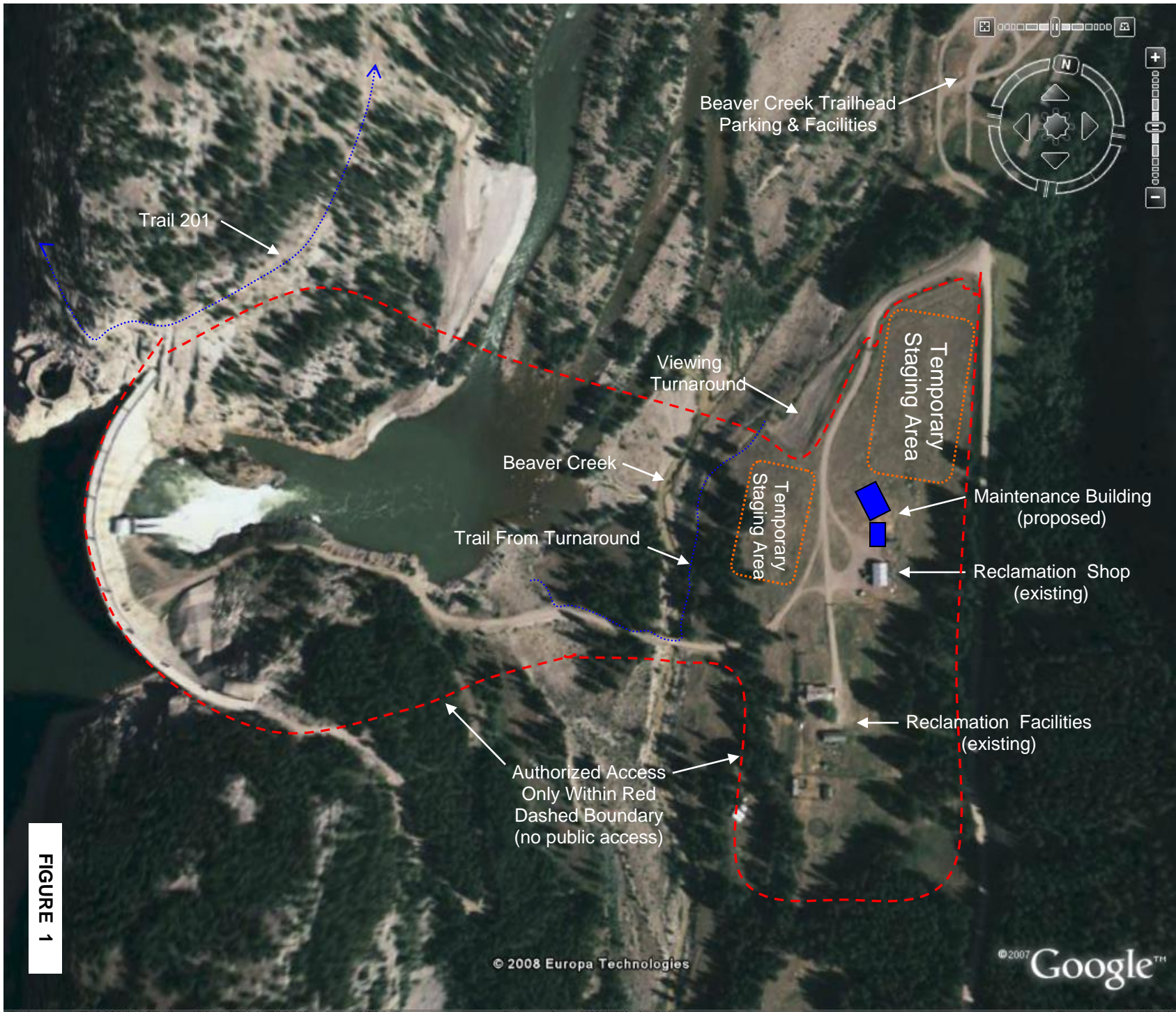


FIGURE 1

Construction of the powerhouse and facilities near the dam will begin in early Fall after irrigation season is over and water releases from the dam are reduced. Construction will continue though Project start-up anticipated for July of the following summer (est. 12-month duration).

Construction to upgrade the existing distribution line in the Sun Canyon will not begin until early Spring to coordinate with the end of the Bighorn sheep lambing season, but prior to heavy recreational use inside the canyon. It is anticipated the transmission line work along FDR 108 will be completed within 2-3 months.

The goal of this Plan is to identify all potential impacts to recreational use and to outline measures to provide a safe environment, and minimize disruption to users visiting the Sun Canyon area. This Plan will be supplemented by and correspond with additional plans to be prepared for the Project including the Erosion & Sediment Control Plan, Traffic Control Plan, Bear Safety Plan, Fire Control Plan, Noxious Weed Control Plan, Blasting Plan (if required), and the Fuel & Hazardous Substances Spill Plan.

RECREATIONAL FEATURES

Trail 201.

USFS Trail 201 extends along the hillside on the north side of the Sun River and Gibson Dam. The trail segment adjacent to the dam is narrow with steep cliffs to the canyon below. The trailhead is located near the lower Klick Ranch about ½ mile downstream from the dam (FDR 8970), and extends in a westerly direction along the north bank of Gibson Reservoir. There is a potential for noise and dust from construction activities to impact recreational use of the trail. Because horse riders use the trail, any sudden loud noise could create a hazard for both the rider and the horse. The distance from the trail overlook and the proposed powerhouse site is approximately 175 yards. (see **Figure 2**)



FIGURE 2. Photo from Trail 201 where it overlooks Gibson Dam. (USBR)

There appears to be adequate distance between the work area at the base of the dam and the nearest point on Trail 201 to prevent significant impact from noise or dust created by construction activity. Should limited blasting be required for the powerhouse structure, short

duration noise impacts, or hazards from inadvertent flying debris could be an issue and would need special attention.

Applicant proposes to take the following measures:

- Post a sign at two locations along the trail, one upstream and one downstream of the dam that read... **“WARNING – Construction Activities at Base of Dam. Heavy Equipment In Use - Expect Loud Noises”**.
- Prior to any blasting activities at the base of the dam, a blasting plan will be prepared for review and approval by resource agencies. As part of the plan, Applicant will close Trail 201 ¼ mile upstream and ¼ mile downstream from the dam at least ½ hour prior to the blast. Construction personnel will walk the trail after its closure, but prior to the blast, to insure no person(s) is within the closed section. The trail will be re-opened after the blast.
- Applicant will monitor dust on a daily basis. If dust becomes a problem, spray water will be applied to the work area creating the dust.
- Applicant will work closely with USFS personnel to monitor noise on a daily basis. If ongoing noise is deemed by USFS personnel to be a hazard to trail users, Applicant will first work with the construction contractor to attempt to reasonably reduce noise. If still thought to be a hazard, Applicant will coordinate with USFS personnel to close the Trail 201 trailhead at FDR 8970, and detour trail users to a temporary trailhead near the Gibson Reservoir public boat launch facility.
- No impacts to fishing opportunities are expected for Trail 201 users between the trailhead and Gibson Reservoir, even if trail closures or detours are implemented.

Viewing Turnaround (FDR 8973).

Forest Development Road 8973 (FDR 8973) branches off from FDR 233 to a viewing turnaround just east of Beaver Creek, approximately ¼ mile downstream from Gibson Dam (see **Figure 3**). The turnaround area is outside of the fenced area used for Reclamation facilities, and the proposed temporary construction staging areas. The turnaround area is sometimes used by visitors as a viewing location to see the dam. A short walking trail extends south from the turnaround and follows the eastern bank of Beaver Creek, then turns west and crosses the bridge on the existing road that accesses the dam from Reclamation facilities. It is unknown if this trail is maintained by either the USFS or Reclamation. It is likely some visitors use the trail to access the tailrace area of the dam for viewing or possible swimming and/or fishing opportunities.



FIGURE 3. Viewing Turnaround (looking southwest). Fence on the left borders Reclamation facilities and proposed temporary construction staging area. Sun River is to the right.

There appears to be a safe and adequate distance between the work area at the base of the dam and the viewing turnaround to prevent significant impact from noise or dust created by construction activity. Should limited blasting be required for the powerhouse footings, short duration noise impacts or inadvertent flying debris could be an issue and would need special attention. There is an existing fence that separates the Reclamation facilities, including the proposed temporary construction staging areas, from the viewing turnaround. Noise from the temporary construction staging areas will be primarily limited to operation of standard construction material handling equipment including dump trucks, forklifts, front end loaders, and flatbed truck/trailers.

Use of the viewing turnaround by recreational users will likely not be impacted by the Project.

Applicant proposes to take the following measures:

- Allow continued public access to the turnaround area during construction activities.
- Post a sign at the west end of the turnaround near the trailhead that reads... **“CAUTION – Construction Area. No Access Beyond This Point. Authorized Personnel Only”**.
- The walking trail extending south and west from the turnaround to access the downstream area of the dam will be fenced off and closed to the public during construction activities for safety concerns.
- Access to the Sun River between Gibson Dam and Beaver Creek on both the north and south side of the Sun River will be closed to the public during construction activities for safety concerns.
- As is currently posted, the public will not be allowed within the fenced area of Reclamation facilities (shop, operators residence, out-buildings), and also includes the proposed temporary construction staging areas.
- Dust will be monitored daily at the temporary construction staging areas. Spray water will be applied as needed to minimize dust.

Beaver Trailhead.

The Beaver Trailhead (**Figure 4**) is located about ½ mile northeast of the dam, and approximately 500-ft north of the eastern most temporary construction staging area. The trailhead includes facilities for loading and off-loading horses, parking for trucks/trailers, and a restroom facility. The trailhead is most heavily used by hunters in the Fall to access the Beaver Creek drainage to the south when FDR 233 is closed, but is also used for overnight camping throughout the summer months. The Project will not limit the use of the trailhead, and would not impede access to the Beaver Creek drainage to the south, or the Sun River to the north.



FIGURE 4. Beaver Trailhead (looking southwest towards dam). The Sun River is to the right.

Applicant proposes to take the following measures:

- Dust and noise from the Project would be monitored daily in an effort to minimize disturbance at the trailhead. Areas at the worksite, including the temporary staging areas, that create dust will be watered as needed to minimize disturbance.
- A sign will be posted at the northern end of the temporary staging area nearest FDR 233 that reads... **“CAUTION. Construction Area – Heavy Equipment in Use”**.

Forest Development Road 108 (FDR 108).

Although a detailed traffic control plan will be developed after final design, and prior to construction, this Plan is intended to identify the potential impacts to recreational use vehicle traffic and provide proposed measures to reduce impacts within the Sun Canyon area. FDR 108 is a paved road extending east from the dam approximately 5-miles to the National Forest Land boundary (see **Figure 5**). The road is used to access Gibson Dam & facilities, campgrounds, fishing & hunting areas, Mortimer Gulch residences, recreational residences on Nation Forest Lands, commercial outfitters, boat launch facilities, wildlife viewing areas, and trailheads within the Sun Canyon area.



FIGURE 5. Typical layout of FDR 108 east of Gibson Dam near Blacktail Gulch Bridge.

Construction efforts near the dam will increase traffic along FDR 108 to include transportation of workers and delivery of equipment and materials. Large equipment, including excavators, loaders, cranes, forklifts and trucks will be mobilized to the site throughout the duration of construction. Material delivery will also occur throughout construction utilizing large flatbed trucks, concrete trucks, and dump trucks.

All recreational user groups who transit FDR 108 to access campgrounds, trailheads, fishing & hunting areas, and residences could be impacted by noise, dust, delays, and hazards from wide loads and construction equipment.

Applicant proposes to take the following measures to minimize potential impacts:

- Applicant will work with the selected contractor to prepare a traffic control plan after final design and prior to start of construction.
- Impose a reduced speed limit for large equipment transiting FDR 108.
- Place signs at various locations along FDR 108 warning of large vehicle and equipment on roadway.
- Use of air brakes (jake brake) will not be allowed to reduce impacts from noise.
- Utilize pilot cars for oversize loads.
- Encourage car pooling for worker transportation to reduce daily construction traffic.

The Project also includes upgrades and improvements to the existing distribution line within Sun Canyon. Work includes construction of a new 34.5kV overhead and underground transmission line and moving the existing distribution line to the new poles, or to the shared trench. The existing poles will be removed to prevent dual lines inside the canyon. The new construction generally follows FDR 108. Approximately 1-mile of transmission line would be buried in a trench along the road in various locations and the remainder would be constructed above ground.

Construction of the transmission line upgrades would occur in the early Spring and would last an estimated 2-3 months. All recreational user groups transiting FDR 108 may be impacted during construction of the new transmission line from noise, dust, and traffic delays.

Applicant proposes to take the following measures to minimize potential impacts during transmission line upgrades in the canyon:

- Prepare a traffic control plan after final design and prior to start of construction.
- Perform transmission line work within the canyon during early Spring to coordinate with the end of Bighorn sheep lambing in the area, and prior to heaviest summer recreational use in the Sun Canyon.
- Apply spray water as needed to reduce dust during trenching activities.
- Limit work hours to start no earlier than 0700 and to end no later than 1800.
- Limit all road closures to Monday through Friday, unless weekend closures are approved by USFS for specific work.
- Post signs on FDR 108 outlining time and duration of any expected traffic delays and/or road closures.
- Include notices in the local newspaper 2 weeks prior to any road closure expecting to last longer than 4 hours.
- Maintain current expected traffic delays or road closure notices on the Project website.
- Make best efforts to keep at least one lane open at all times with limited delays.
- Provide prior notice to all residences with electrical service of any required planned power outages required to prosecute the work.

Blacktail Corrals.

The Blacktail Corrals are located north of the Sun River, near FDR108's Blacktail Gulch bridge, approximately 1/2 mile northeast of Gibson Dam. The corrals are currently permitted for use to Sun Canyon Lodge, LLC. The corrals are used for horse boarding during Summer backcountry trail rides and Fall hunting activities offered by the lodge.

Noise from Project construction is not expected to significantly affect the use of the corrals because of the distance between the work area and the corrals. Dust from construction activities is not expected to significantly affect the use of the corrals because the access road to the Project work site (FDR 108) is paved in the vicinity of the corrals. Access to the corrals via FDR 108 could experience short term traffic delays due to upgrades to the distribution system in the canyon during early Spring while the work is progressing.

Applicant proposes to take the following measures to minimize potential impacts to Commercial Outfitter use of the corrals:

- Provide prior notice to corral permittee of all construction activity near Blacktail Gulch bridge in an effort to coordinate with corral use.
- Initiate all measures previously stated under feature FDR 108.

Home Gulch Campground.

The Home Gulch Campground is about 2-1/4 miles downstream from the dam. The campground hosts about 15 campsites located in dense trees between the Sun River and FDR 108.

Recreational users of the campground could be impacted by noise from large transport vehicles transiting past the site. Campers could face hazards while entering onto FDR 108, from the campground, by construction related vehicles. FDR 108 is paved adjacent to the campground,

and therefore it is unlikely dust will be of concern. Access from the campground to the Sun River would not be impeded. The transmission line is of overhead construction in the area adjacent to the campground, and is located on the south side of FDR 108, therefore impacts to campers during construction of the line would be short term and insignificant.

Applicant proposes to take the following measures to minimize potential impacts to use of the campground as follows:

- Post a sign on campground exit road that reads... “**Caution. Large Vehicles on Roadway**”.
- Applicant will not allow use of the campground(s) to Project workforce during construction of the Project unless approved by the USFS for specified use.
- Initiate all measures previously stated under feature FDR 108.
- Limit work activities during Memorial Day weekend and Independence Day weekend.

Home Gulch Boat Launch.

The Home Gulch boat launch facility is located approximately 2.1 miles east of Gibson Dam on the south bank of the Sun River, and north FDR 108. The launch is generally used for small non-motorized boats for recreational use in Diversion Lake, immediately upstream of Diversion Dam on the Sun River. The upgrade to the distribution line is of overhead construction in the vicinity of the launch, and is located on the south side of FDR 108. Major construction efforts in this area will be short term (estimated 2-3 weeks), and will not significantly affect use of the boat launch.

Applicant proposes to take the following measures to minimize potential impacts to use of the boat launch as follows:

- Do not park equipment or store material in such a way that would block access to the boat launch.
- Initiate all measures previously stated under feature FDR 108.

Dispersed Campsites.

There are several dispersed campsites located between FDR 108 and the Sun River, near the south bank of the river between Hannan Gulch extending east to the National Forest Lands boundary. The upgrade to the distribution line is generally of overhead construction in the vicinity of the various camp sites. The work is also generally on the south side of FDR 108, whereas the campsites are generally on the north side. The Project likely will not significantly affect use of the dispersed campsites because of the relatively short work duration near each campsite location (estimated 2-3 weeks).

Applicant proposes to take the following measures to minimize potential impacts to use of the dispersed campsites as follows:

- Do not park equipment or store material in such a way that would block access to the campsites.
- Initiate all measures previously stated under feature FDR 108.

- Limit work activities during Memorial Day weekend and 4th of July weekend.

Watchable Wildlife Interpretive Site.

A watchable wildlife interpretive site is located near Diversion Lake to the north of FDR 108. Use of the feature may be impacted for short durations (1-2 hours) due to construction activity adjacent to the pullout during construction of the overhead transmission line.

Applicant proposes to take the following measures to minimize potential impacts to use of the Interpretive Site as follows:

- Only required equipment use required for current construction efforts will be allowed in the area to minimize visitor accessibility to the interpretive site.
- Initiate all measures previously stated under feature FDR 108.

RECREATIONAL USERS

The long term construction efforts will be focused at or near the dam where public access is already limited or restricted. Therefore, recreational impacts to all four user groups is generally limited to construction traffic on FDR108 for the duration of construction (estimated 12-14 months starting in late Summer), and during construction work on the transmission line upgrades in the Sun Canyon (estimated 2-3 months starting in early Spring).

General Public.

The general public utilizes the Sun Canyon for year round activities including hiking, fishing, boating, wildlife viewing, camping, hunting, and horse back riding. Visits include both day trips, and overnight camping. According to the USFS, the heaviest use is during the summer months beginning the July 4th weekend through the end of hunting season near the end of November. If weather permits, Memorial Day weekend can also be busy, then visits are low again through June until the July 4th weekend.

Applicant proposes to take the following measures to minimize potential impacts to the General Public as follows:

- Initiate all measures to minimize potential impacts as outlined for each of the Recreational Features detailed above.
- Limit work activities on transmission line upgrades in the Sun Canyon during Memorial Day weekend and 4th of July weekend.
- Address any concerns the USFS presents during execution of the work and modify this plan accordingly.

Homeowners on Private Land in Mortimer Gulch.

Approximately twenty private residences are located on private land within the National Forest boundary. The properties are located in Mortimer Gulch north of Gibson Reservoir and the boat launch facility, and are accessed via FDR108. The houses are generally used as Summer homes

but may also include some year round residences. A commercial outfitter is also located within Mortimer Gulch.

Applicant proposes to take the following measures to minimize potential impacts to the home owners in Mortimer Gulch as follows:

- After final design of the transmission upgrades is completed, and prior to beginning construction activities, a work plan will be presented to the home owners detailing work schedules, access requirements, and construction techniques to be used.
- Applicant will make best efforts to address all home owner concerns and modify work plans as able.
- Initiate all measures to minimize potential impacts as outlined for each of the Recreational Features detailed above.
- Limit work activities on transmission line upgrades in the Sun Canyon during Memorial Day weekend and 4th of July weekend.
- Address any concerns the USFS presents during execution of the work and modify this plan accordingly.

Recreational Residence Owners on National Forest Lands.

Many recreational residences are located in the gulches extending from the Sun Canyon including Home Gulch, Hannan Gulch, Lower Home Gulch, and other cabins dispersed throughout the canyon area. The cabins are generally used as summer homes but may also include some year round residences. Most cabins are located a short distance off FDR108 but some are located adjacent to the road. Construction road traffic as well as noise and traffic delays during transmission line upgrades may impact use of the cabins.

Applicant proposes to take the following measures to minimize potential impacts to the recreational residence owners on National Forest lands as follows:

- After final design of the transmission upgrades is completed, and prior to beginning construction activities, a work plan will be presented to the cabin owners detailing work schedules, access requirements, and construction techniques to be used.
- Applicant will make best efforts to address all cabin owner concerns and modify work plans as able.
- Initiate all measures to minimize potential impacts as outlined for each of the Recreational Features detailed above.
- Address any concerns the USFS presents during execution of the work and modify this plan accordingly.

Commercial Outfitters.

The USFS has identified three commercial outfitters operating near the Project. The name of the commercial outfitters and a description of their location and operations follows:

The *Sun Canyon Lodge* is located in Home Gulch approximately 2.5-miles east of Gibson Dam, and .5-mile south of FDR108. According to their website, www.suncanyonlodge.com, the lodge offers:

- Back Country Hunts (Pack-in)
- Lodge Hunts
- Drop Camps (Summer & Hunting)
- Summer Horseback Vacations
- Back Country Fishing Trips
- Photography
- Summer Resort Vacations
- Cabin Rental
- Restaurant/Bar

The *K Bar L Dude Ranch* is located at the west end of Gibson Reservoir where the north and south fork of the Sun River meet, approximately 6-miles northwest of Gibson Dam. The lodge can only be accessed via a jet boat up Gibson reservoir or saddle horse and pack mule along a scenic mountain trail to the ranch. According to their website, www.guestranches.com/kbarl/, the *K Bar L Dude Ranch* is a superb mountain retreat and includes a main dining lounge and guest cabins.

The *Triple J Wilderness Ranch* is located in Mortimer Gulch north of Gibson Reservoir. According to their website, www.triplejranch.com, the ranch offers a family oriented vacation destination with a wide variety of activities, and an emphasis on western horseback riding.

Each of the commercial outfitter's base operations are located a distance from the proposed construction activities. Most activities enjoyed by their guests are also located in wilderness areas away from the proposed construction activities. However, construction road traffic as well as traffic delays during transmission line upgrades may impact access to the ranches and/or trailheads.

Applicant proposes to take the following measures to minimize potential impacts to the commercial outfitters as follows:

- After final design of the transmission upgrades is completed, and prior to beginning construction activities, a work plan will be presented to the commercial outfitters detailing planned work schedules, access requirements, and construction techniques to be used.
- Applicant will make best efforts to address all commercial outfitter concerns and modify work plans as able.
- Initiate all measures to minimize potential impacts as outlined for each of the Recreational Features detailed above.
- Address any concerns the USFS presents during execution of the work and modify this plan accordingly.

APPENDIX A
AGENCY CONSULTATION

A Draft Recreation Plan During Construction was initially distributed for comments via email on October 23, 2008 to the State and Federal resource agencies listed below:

Mr. Steve Davies
Montana Area Office
U.S. Bureau of Reclamation
P.O. Box 30137
Billings, MT 59107-0137
sdavies@gp.usbr.gov

Ms. Laura Conway
USDA Forest Service
Lewis & Clark National Forest
P.O. Box 869
Great Falls, MT 59403-0869
lconway@fs.fed.us

Mr. Glenn Phillips
Habitat Protection Bureau Chief
Montana Department of Fish, Wildlife & Parks
1420 6th Avenue East
Helena, MT 59620-0701
gphillips@mt.gov

Comments on the Draft Recreation Plan were received from USDA Forest Service in a letter dated November 26, 2008 (copy attached). No other comments were received. Following is a summary of their comments and the Applicant's response to each as incorporated into this final Recreation Plan During Construction:

ID	Agency Comment	Applicant Response
USFS1	Clarification to project land ownership and USFS responsibilities for management of recreational use.	Comment noted.
USFS2	Include additional various recreational <u>users</u> who could be impacted.	Listed recreational users identified by USFS who could be impacted by Project construction. Included additional discussion under

		“Recreational Users” section of the plan.
USFS3	Identify Blacktail corral as recreational feature.	Added Blacktail corral as a recreational feature as suggested and included discussion “Recreational Features” section of the plan.
USFS4	Discuss timing of construction as relates to duration of impacts to the recreational experience.	Provided summary work timeline for powerhouse work near the dam, and transmission line upgrade work within the Sun Canyon, and provided additional discussion throughout plan.
USFS5	Identify additional recreational features within the Sun Canyon along the road corridor east to the Forest boundary.	Added additional recreational features in “Recreational Features” section of the plan as suggested by USFS, and provided discussion.
USFS6	Add “overnight camping” to description of uses at Beaver Creek Trailhead.	Added wording as suggested to discussion on Beaver Creek Trailhead.

October 23, 2008

Ms Laura Conway
US Department of Agriculture, Forest Service
lconway@fs.fed.us

Mr. Steve Davies
U.S. Bureau of Reclamation, Great Plains Region
sdavies@gp.usbr.gov

Mr. Glenn Phillips
Montana Fish, Wildlife & Parks
gphillips@mt.gov

REF: Gibson Dam Hydroelectric Project, FERC No. 12478-002
SUB: Electronic Distribution of Draft Recreation Plan and Request for Comment

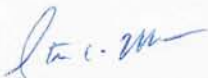
Dear Agency Lead:

Attached is a copy of the Draft Recreation Plan for the proposed Gibson Dam Hydroelectric Project, FERC No. 12478-002. Please review the plan and provide written comments, if any, within 30 days of the date of this letter. Your comments should be faxed, mailed or emailed to:

Gibson Dam Hydroelectric Company, LLC
Attn. Steve Marmon, Project Manager
3633 Alderwood Ave.
Bellingham, WA 98225
(360)733-3056 FAX
smarmon@whitewatereng.com EMAIL

Please contact me at (360)738-9999 or smarmon@whitewatereng.com should you have any questions. Thank you for your continued participation in the licensing process.

Sincerely,



Steven C. Marmon
Project Manager

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File Code: 2720

Date: November 26, 2008

Steve Marmon
Project Manager
Gibson Dam Hydroelectric Company, LLC
3633 Alderwood Avenue
Bellingham, WA 98225

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Dear Mr. Marmon:

This letter is in response to your request for comments on the Gibson Dam Hydroelectric Project, FERC No. 12478-002, 1) Draft Recreation Plan, 2) Special Status Plant and Noxious Weed Survey Report and Construction Plan Recommendations, 3) Draft Post-Construction Water Quality Monitoring Plan, 4) Draft Construction Water Quality Monitoring Plan, and 5) Draft Bear Safety Plan. Attached you will find two documents with specific comments related to the Draft Recreation Plan and the Draft Bear Safety Plan.

As for the Special Status Plant and Noxious Weed Survey Report and Construction Plan Recommendations, our sensitive plant coordinator Tanya Murphy noted that rattlesnake plantain did not leaf out or flower until well into August in 2008. This plant could have been missed during your surveys. At this time we are not requesting additional surveys, however we would like to be informed if this plant is located in the project area at a later date.

In the Water Quality Monitoring Plans, it would be helpful if the sampling location map showed more detail, such as roads and Diversion Dam. Also, the composite graph of Dissolved Oxygen levels for the three year period is difficult to tease out the important data. We request that the data be displayed graphically for both yearly and a three year period.

The project area maps in your reports indicate the area around Gibson Reservoir owned by the Bureau of Reclamation. This is inaccurate. Attached you will find a map with the correct designation for these lands. The area is U.S. Forest Service land, withdrawn for reclamation purposes. The Bureau of Reclamation manages the area for the water uses and the dam. The Forest Service maintains ownership and continues to manage the recreational uses in the area.

If you have any questions regarding these comments please contact Laura Conway at 406-791-7739.

Sincerely,

Robin Strathy

for LESLEY W. THOMPSON
Forest Supervisor
Enclosures



Gibson Dan Hydroelectric Project, FERC No. 12478-002
Draft Recreation Plan Request For Comments

Although the plan identifies and addresses 5 specific recreational **features** within the construction zone, the various recreation **users** are not identified and no effects to these **users** are disclosed.

Recreation users who could be impacted include:

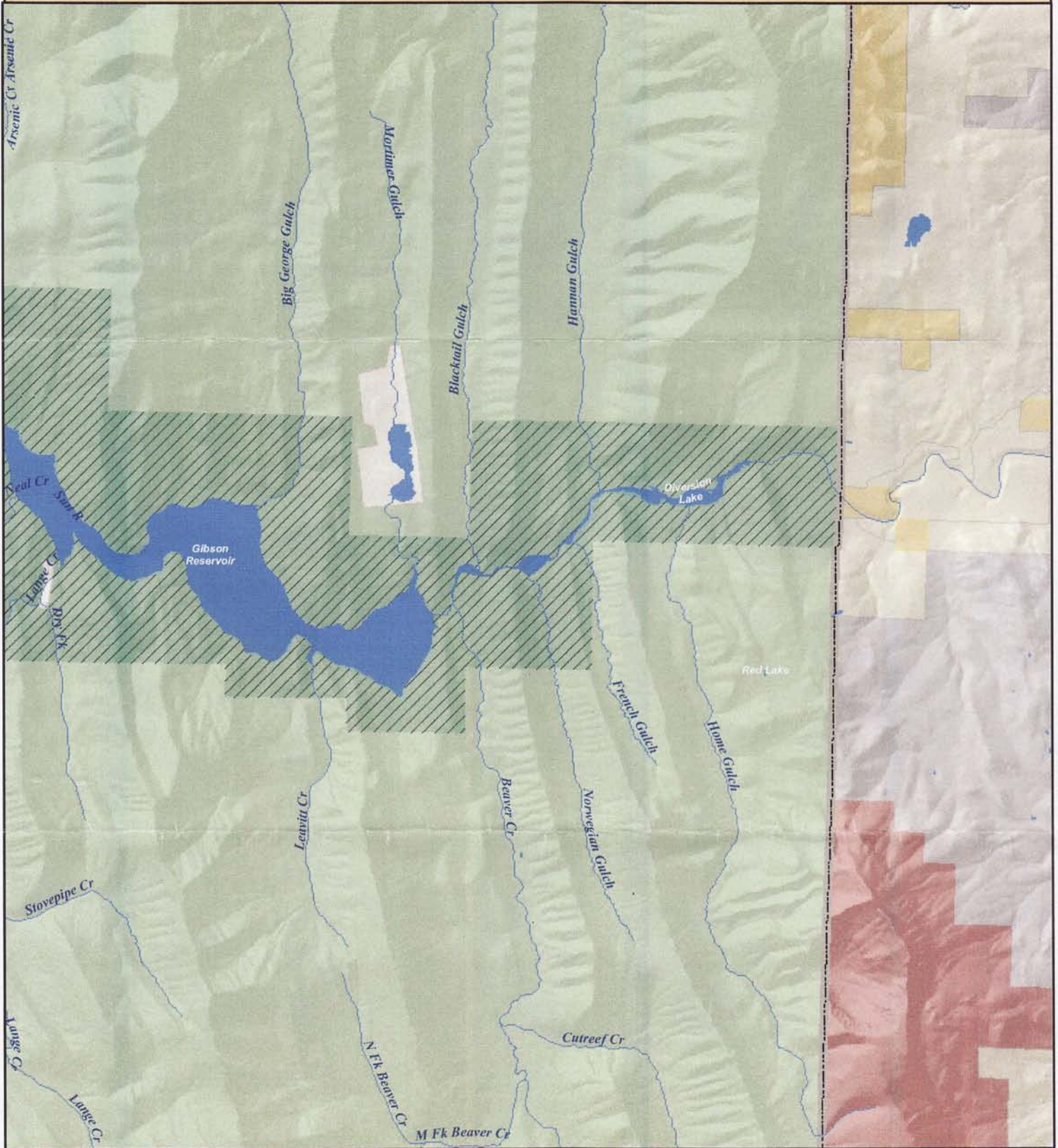
- General public
- Homeowners on private land in Mortimer Gulch
- Recreation residence owners on National Forest land (current distribution lines are near cabin tracts, i.e. Lower Home Gulch cabins, Perry cabin next to Beaver Creek Trailhead, Hannan Gulch cabins)
- Commercial outfitters (Sun Canyon Lodge, Sun Canyon LLC, K-L Ranch, JJJ Wilderness Ranch)

Another recreational feature just outside of the mapped construction zone boundary is the Blacktail corral that is permitted to Sun Canyon Lodge, LLC. Impacts here could vary depending on timing of construction and should be analyzed.

The Plan should discuss timing (impacts could be different depending on timing) and duration of impacts to the recreational experience for both construction near the dam site as well as upgrade of the distribution lines. The plan should also identify recreational features along the road corridor east to the Forest boundary to effectively analyze impacts during distribution line upgrade (i.e. dispersed campsites, Home Gulch Boat launch, watchable wildlife interpretive site, etc.). It's difficult to predict where impacts could occur as we don't know the final plan for burying line vs. overhead so all possibilities should be analyzed.

Add to description of uses at Beaver Creek Trailhead – “overnight camping”. This use is not just a fall hunting use and does occur throughout the summer months.

Gibson Dam Hydroelectric Project FERC NO. 12478-002 Project Area



-  Administrative Boundary
-  Bureau of Land Management
-  Private Lands
-  State Lands
-  US Forest Service Lands
-  Wilderness Areas

 USFS Lands - Withdrawn for reclamation purposes

