

Alexander Wait
State of Alaska Department of Natural Resources
Division of Mining, Land and Water

November 30, 2011

Dear Mr. Wait,

On behalf of the board and members of the Denali Citizens Council I am pleased to submit these comments regarding the proposed NEON site near Healy. The Denali Citizens Council, founded in 1974, is composed of local, regional and national citizens who seek to protect the natural integrity of Denali National Park and to promote intelligent, sustainable development on lands outside the park. We work in the gateway communities of Healy, McKinley Park and Cantwell to raise awareness of actions that could affect the regional ecosystem, the national park and local lifestyles. Find us online at <http://www.denalicitizens.org>.

We are particularly interested in sustaining the unique character of the Stampede townships west of Healy, which include state lands enclosed on three sides by the National Park. This area, once proposed for inclusion within the park, has remained relatively undeveloped, despite some rather grandiose proposals. It is used for local and regional recreation, both motorized and non-motorized, and for both consumptive and non-consumptive use of wildlife. Both summer and winter tourism to this area have increased over the past 20 years, especially in the summer months, when the tourism industry expands the human impact on these lands. We support the creation of a State Recreation Area on lands that include the currently proposed NEON site, as a way to ensure more proactive management of present and future uses there.

Before detailing our concerns, I would like to thank you for providing additional public comment opportunities on this process. We are aware that the original application occurred in 2010 and the proposed construction is planned for this coming year, 2012. It isn't clear, however, how meaningful this current public comment opportunity will be with respect to the overall conditions of the permit. We are hoping that the concerns expressed by DCC, other local groups and area citizens can and will influence you to make important and substantive changes in the state permit, resulting in a project that is both scientifically useful and acceptable to the local community.

Below we list the concerns of the Denali Citizens Council regarding the NEON project near Healy.

- A. Purpose and Need – A “Purpose and Need for Facility” is presented on the first page of the Neon Plan of Development project document. This short paragraph describes the purpose of the program in general, but fails to address the need for this particular site at this particular place. It is, rather, a generic description of the entire program, not this specific location.
- B. More explanation of the ultimate, long range goals of the NEON project now, early on, would enhance the permittee's credibility within the local community. This project has laudable, long-range goals. However we'd like to see the project engage in some more locally-focused goals, keeping in mind the ecosystem and other

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conservation values that already exist in this region. The project should attempt to be relevant in a Denali context, through local educational outreach, cooperation with Denali National Park science staff, etc.

- C. Site selection - More information on how the selected site was chosen would help us understand and respond to this project. Preferred would have been an attempt by NEON to learn, from locals, what areas they would suggest be used, based on a mutual discussion of the needs of the program, the land use values of the area and the likely long range impacts of the project.
- D. The state has already made a commitment to keep lands surrounding the proposed NEON site in the most protective planning classification – *wildlife habitat*. The state lands surrounding the proposed site are classified, in the Tanana Basin Area Plan, as *wildlife habitat/public recreation* lands. The state, during its process of conveying lands to the Denali Borough in 2009, ultimately declined to remove lands near this site from the maximally protective classification of “*wildlife habitat*” for purposes of conveying them to the Denali Borough, thereby retaining them in state ownership. This decision by the state of Alaska was not taken lightly, but done because the state recognized “the unique importance of this particular area for wildlife and recreation...” (TBAP Amendment- November2008). We are not at all convinced that construction of even temporary infrastructure, huts, towers, outbuildings, power lines and boardwalks, is appropriate on such lands. In addition, it will leave scars, despite the most careful rehabilitation, and will have set a precedent.
- E. During this comment process, the state has not presented an actual copy of the permit to be granted to NEON by the state of Alaska. Perhaps the permit is available, but we have not been directed to a site or other location where it can be reviewed. We feel that, in order to allay concerns among locals, the draft/final permit should be made available online. In the absence of direct knowledge of permit content, we hope that the permit will be adequate in the following areas:
 - a. It must adequately describe the specific efforts that DNR will require that NEON take in the construction and removal of this site to minimize surface disturbance of the land.
 - b. It should address the impact of additional traffic on the Stampede Road associated with activities at the site. Has the permit noted whether or not additional road maintenance of the Stampede Road might occur in order to improve access to the site, especially in winter? What has been permitted as a parking area and how large?
 - c. Does the permit allow any helicopter access or usage during either construction or maintenance of the site? How much? How often?
 - d. Does the permit set parameters for any light created through winter operation of the site? The site is located in an area where use of floodlights or high lumen lighting of any kind would be very noticeable. Does the permit discuss mitigations of viewshed impacts of the infrastructure and tower? The area where the site is proposed is open tundra/taiga. Buildings and structures would likely be visible from far away.
 - e. The permit should summarize the costs to the state and to Neon associated with the permit. We are especially curious about the cost of building new power lines from the existing grid.
 - f. The permit should describe how the state of Alaska will monitor the construction, operation and removal of the site in order to ensure that stipulations of the permit are adhered to.
 - g. The state should indicate how the site will permit existing trail use and access and what parts or areas of the site will be considered “private” or “off limits.”
- F. Power lines – The proposed site is a mile from the nearest electric power infrastructure. We were **astounded** to learn that the project has enough money to pay for the laying of new power lines to the proposed NEON

site. The implications of additional power line infrastructure in an area used mostly as habitat and recreation are huge. Although DNR has committed to the concept of removal of the lines after the NEON site is no longer operational, we are not at all convinced that such actually WILL happen. If DNR can provide a legal guarantee of removal, our fears might be somewhat allayed. It would seem, however, much more logical and cost effective to place the project in an area closer to existing power lines. Such an area could possibly be found further back toward the existing subdivision and north of the Stampede Road.

- a. Data lines – It is not clear whether or not this project would require the laying of cable for data transmission or the installation of wireless communications towers. Has the permit considered these possibilities and their regulation?
- b. Use of a generator – The information from the state and NEON does not provide a side- by-side comparison of the use of a diesel generator to power the site v. the extension of power lines to obtain electricity. How do costs, impacts and mitigations compare for these two potential choices? Other NEON sites use generators. A reasonable comparison of these options should be relatively easy to do.

The above are a few of our concerns, as an active, community-based conservation and public education organization. There would be much to gain from the type of scientific investigation described in the NEON project, but the impacts of infrastructure, siting and power acquisition for this individual site are troubling. To be certain that the benefits of this project outweigh the negatives, we request the following:

- a. Please delay issuance of final DNR permit for this project until there can be a meeting of DNR and NEON representatives in Healy to more thoroughly explain and discuss this individual project and to answer local questions.
- b. Please consider an alternative siting for this complex that does not involve laying new power lines far beyond the existing subdivision.

Sincerely,



Nancy Bale, Director DCC

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cc. Jody Bolyard, NEON Director of Environmental Health and Safety

Dr. Elizabeth Blood, NSF