

**Comments to the Federal Energy Regulatory Commission
Docket Number P-14241, Susitna-Watana Hydroelectric Project**

May 31, 2012

On behalf of the Board of Directors of the Denali Citizens Council, I submit the following comments on the Susitna-Watana Hydroelectric Project, Docket No. P-14241.

The Denali Citizens Council (DCC) is a grassroots conservation organization founded in 1974, now with over 300 members mostly in the Denali Borough area. DCC works to protect the natural integrity of Denali National Park and Preserve by supporting the ecological and wilderness values for which the Park and Preserve was established. DCC also fosters responsible planning in the greater Denali park community. For both parts of our mission we have concerns related to the proposed Susitna-Watana dam.

The Denali Citizens Council (DCC) is concerned that any energy project in the greater Denali ecosystem results in the minimum impacts to wildlife. DCC also believes that any project must be planned so that development within the Denali Borough proceeds thoughtfully so that the qualities making the Borough a great place to live, work, and visit are retained. Finally, DCC is interested in ensuring that the most sustainable, least polluting, and least land-intensive solutions are deployed to meet the energy needs of the Denali Borough and the Railbelt.

We have reviewed the comments submitted by other conservation organizations and we generally support those comments. In addition, we have the following comments on the study plan.

- 1) Big game/wildlife studies should evaluate the impacts on wildlife which utilizes Denali National Park and Preserve, such as the Nelchina Caribou Herd. The greater Denali ecosystem is one of the best protected intact natural ecosystems in the United States, although the national park boundaries do not encapsulate the entire ecosystem. Because of the park's importance for wildlife-related tourism and research, the impacts of the hydroelectric project need to be understood in terms of its impacts on Denali's wildlife.
- 2) Socio-economic analyses need to include a particular focus on likely land use and economic impacts in the southern Denali Borough. What will be the likely changes in population in Cantwell and surrounding area during construction and permanently? How much new housing and construction will be required? What local government expenditures would be necessary during construction phases and ongoing operation related to education, emergency services, and land use planning? These questions are potentially applicable to the northern Mat-Su Borough as well.

DCC Board of Directors

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3) As a side issue of the above, federal subsistence use should be included in socioeconomic studies. Cantwell is a resident-zone community for the purpose of determining federal subsistence eligibility at Denali. If the population of Cantwell expands dramatically as a result of dam construction or future operation, there could be significant impacts on wildlife in national park areas that presently see limited subsistence use.

4) Recreational use studies need to include evaluation of existing recreational uses along the Denali Highway as well as projections of how those uses would change if the dam were constructed. Existing and potential future use of the relatively unmanaged southeastern portion of Denali National Park should also be evaluated.

Thank you for including our concerns in your studies.

Sincerely,
Charlie Loeb
President, Denali Citizens Council