

Denali Citizens Council



Advocating for Denali's Wilderness, Wildlife and Way of life.

February 13, 2015

Secretary, Federal Energy Regulatory Commission
888 First Street, NE
Washington D.C., 20426

RE: MOTION TO INTERVENE IN THE MATTER OF THE APPLICATION FOR A
PRELIMINARY PERMIT FOR THE BRUSKASNA CREEK HYDROELECTRIC PROJECT IN
THE DENALI BOROUGH, PROJECT NO. P-14652

To Whom It May Concern:

The Denali Citizens Council (DCC) is a grassroots conservation organization founded in 1974, now with approximately 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.

DCC is concerned that any energy project in the greater Denali ecosystem results in minimum impacts to wildlife and residential quality of life. 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.

INTRODUCTION: On December 16, 2014, the Federal Energy Regulatory Commission (FERC) issued a noticed regarding a preliminary permit application for the Bruskasna Creek Hydroelectric Project (FERC No. P-14652) located within the Denali Borough. In accordance with Rule 214 of FERC's Rules of Practice and Procedures, 18 C.F.R. Sec. 385.214, the Denali Citizens Council requests to intervene in the BC Energy, LLC's application for a preliminary permit so as to be kept informed of all matters and correspondence related to this project.

STATEMENT OF INTEREST: The Denali Citizens Council is a nonprofit, grassroots public education and advocacy organization concerned with Denali National Park and its gateway communities. The organization has approximately 300 members, most of whom reside within the Denali Borough, including the McKinley Village, Carlo Creek and Cantwell area. Since the formation of our organization in Cantwell in 1974, we have worked to protect the greater Denali ecosystem, and for the last decade have been very actively involved in local and state land use and energy issues affecting the Denali

PO Box 78

Denali Park AK 99755

www.denalicitizens.org

mail@denalicitizens.org

907-683-3396

Board of Directors

David Arnold

Nancy Bale

Sarah Bartholow

Nan Eagleson

Brian Napier

Michael Raffaeli

Hannah Ragland

Erica Watson

Borough. We are concerned about the overflow land use impacts from hydroelectric projects within the Denali Borough, the relationship between the dam and other energy alternatives being developed in Denali Borough, and ecological effects on Denali National Park and the greater Denali ecosystem.

GROUNDS FOR INTERVENTION: Our participation is in the public interest, in accordance with 18 C.F.R. Sec 385.214(b)(2)(iii). We are a local citizens organization involved in land use and energy issues within the Denali Borough, and the only local citizens organization that works to protect the resources of Denali National Park and Preserve.

The construction of the Bruskasna Creek hydroelectric project has implications for land use. McKinley Village, Carlo Creek and Cantwell are the nearest communities to likely points of access to the construction site for the dam, and as a result would likely see development impacts related to construction and on-going operation of the dam if the project moves forward. The Denali Citizens Council has long represented citizen interest in land use planning throughout the Borough, particularly in work on the Borough's Comprehensive Plan and planning and management for the Borough's municipal land entitlements. Recognizing the overwhelming importance of tourism for the Borough (and in turn for the state), we advocate for land use policy that will assure the Denali Borough retains the qualities that make it one of the Alaska's premier tourism destinations.

Development and population growth in these areas may in turn affect local use of Denali National Park and Preserve, and in the greater Denali ecosystem. The dam may also have ecological effects on the national park, particularly related to wildlife movements. The Denali Citizens Council has been active in protecting the wildlife of the greater Denali ecosystem since our formation to advocate for expansion of the national park boundaries during the ANILCA era.

Finally, the Denali Borough is increasingly involved in energy production. Usibelli Coal Mine near Healy is the only active coal mine in the state, and the company is seeking to expand operations. One coal-burning power plant in Healy will soon be joined by another – the long-dormant Healy Clean Coal Project. Eva Creek Wind Farm is producing electricity. The Australian company Linc Energy has received permits to explore an underground coal gasification project. Usibelli Coal Mine has a license to explore for natural gas within the Borough. Energy produced by several proposed hydroelectric projects may have implications for the economics of developing these other energy sources. The Denali Citizens Council has been very active in representing the local citizen interest in these energy projects, particularly the Healy Clean Coal Project and the Usibelli gas exploration project where we have participated in federal regulatory and state best interest finding processes.

STATEMENT OF POSITION: The Denali Citizens Council (DCC) is concerned that any energy project in the greater Denali ecosystem results in the minimum impacts to wildlife and the quality of life of local residents. DCC also believes that any project must be thoughtfully planned 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.

REQUEST: For the above stated reasons, Denali Citizens Council moves the Commission to issue an order granting our Motion to Intervene in any proceedings that may be convened regarding the Bruskasna Creek Hydroelectric Project. Denali Citizens Council wishes to be informed regarding progress reports or any other filings by the preliminary permit applicant. This includes being added to all official service and mailing lists regarding the aforementioned preliminary permit application. Please send such information to the following contact:

Hannah Ragland, President

Denali Citizens Council

P.O. Box 78

Denali Park, AK 99755

hannah@denalicitizens.org