Denali Citizens Council

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

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

Re: Preliminary Permit Application comments on Carlo Creek Project, P-14645

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 the 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.

In recent comments on another hydroelectric project proposal, FERC asserted that studies that are deemed to be necessary are best determined through other agencies. This defies the purpose of the preliminary permit period, where members of the public are allowed an opportunity to provide concerns and recommend additional studies that would be beneficial to determine the proposed projects impacts. In fact, according to the FERC guide on hydroelectric projects[1]:

"Commission staff then seeks input from the public, nongovernmental organizations, Indian tribes, and local, state, and federal resource agencies in order to (1) identify environmental issues regarding a proposed or existing project and (2) ***determine what studies are needed in order to better understand these issues****. To that end, staff will hold public scoping meetings and a project site visit. The applicant then works with Commission staff and stakeholders to develop a scientifically supported study plan that will characterize resources (such as recreation, water quality, etc.) potentially affected by the project and the potential effects on those resources."*

[1] "Hydropower Licensing – Get Involved," FERC; accessed at: http://www.ferc.gov/for-citizens/citizen-guides/hydro-guide.pdf

In addition to this, the guide suggests that, "*Specifically, your participation in licensing discussions may influence decisions about* ***which issues to examine, which studies to conduct, and which environmental measures to include in the license application***."

Instead of using considering our previous comments, FERC has suggested, in recent response to comments, that "…the studies to be undertaken by a permittee are shaped by the Commission's filing requirements for development applications." This appears to contradict the information presented to the public for why involvement is important during this stage of the permitting process, and on what topics will be considered. Ignoring suggestions carte blanche fails to consider the merits of any individual study.

If this is not the phase or opportunity to suggest additional studies, when does this opportunity for the public occur? To deny any opportunity to provide meaningful feedback on which studies would be beneficial at this point in the permitting process appears to be contradictory to what the public has been told is possible at this stage.

In that light, and as we have suggested for other proposed hydroelectric projects in this area, we would like to provide feedback on the studies anticipated by the applicant, and encourage consideration of several additional criteria, including:

1) Big game/wildlife studies should evaluate the impacts on wildlife that utilizes Denali National Park and Preserve, such as local caribou populations. 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. In addition to the importance of wildlife in relation to the greater Denali ecosystem, some populations, including the Denali, Delta and Nelchina caribou herds, play an important role in providing subsistence opportunities. This should also be a consideration in the applicant's studies.

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?

3) Recreational use studies need to include evaluation of existing recreational uses along the Carlo Creek corridor as well as projections of how those uses would change if the dam were constructed.

4) Energy production studies should consider different types of dam construction, and the different levels of energy that could be produced by changing the design. For example, potential energy production from an in-stream turbine (with no damming of Carlo Creek) should be considered so that a comparison can be made of the cost and benefits of constructing a dam versus a low head hydroelectric system that would not require damming of the creek.

5) Water quality studies should consider the overall impacts to riparian habitat and habitat fragmentation. These studies should include baseline monitoring of water quality and quantity, fluvial geomorphology modeling (below the proposed dam), ice processes in Carlo Creek, and riparian instream flow.

6) Considering the high seismicity in the area, engineering studies should include identification of seismic conditions surrounding the proposed site and in relation to the proposed facilities.

7) Studies should consider alternative access roads in order to determine minimal impacts to the creek corridor, as well as to minimize siltation due to erosion from roads in this narrow canyon. The route of the access road is proposed to cross a steep hillside. Modeling for potential hazards associated with a road on so steep a hillside should also occur.

8) Studies should focus attention on the operation of a dam during winter months, when losses of efficiency and generating capacity, stresses on materials, and higher maintenance costs could occur. Studies should obtain data from existing dams in subarctic landscapes to develop an accurate projection of costs vs. benefits for this project. The Carlo Creek area is known for its severe winter weather, including high winds, low temperatures and heavy snowfall stretching over a period of five months.

Thank you for including our concerns in your consideration of studies. We hope that you will consider our comments, rather than defer to some later stage in the permitting process, as this is the stage that FERC has identified that the public can, and should be, involved with recommending further studies. Ignoring our recommendations without consideration does not appear to comply with the public process that is described in online sources. We also request that a public meeting be scheduled as early as possible in this process in order to inform local residents of the plan for research, and to provide additional information about the proposed project.

Sincerely,
/s/ Hannah Ragland
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