

Denali Citizens Council



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

January 30, 2015

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

Re: Preliminary Permit Application comments on Jack River Project, P-14646

To Whom It May Concern:

The Denali Citizens Council 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.

The Denali Citizens Council (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.

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 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? These questions are potentially applicable to the northern Mat-Su Borough as well.

- 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 Jack River corridor as well as projections of how those uses would change if the dam were constructed.
- 5) 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 the River) should be considered so that a comparison can be made of the cost and benefits of a large versus small-scale hydroelectric project.
- 6) 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 the Jack River, and riparian instream flow.
- 7) 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.
- 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 Cantwell 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 studies. 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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