



Southeast Alaska Conservation Council

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December 6, 2010

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Subject: **SCOPING COMMENTS ON: Cascade Creek Hydroelectric Project No. 12495-002**

Dear Secretary Bose:

Thank you for the opportunity to submit scoping comments on the proposed Cascade Creek Hydroelectric Project located near Petersburg, Alaska (*Project No. 12495-002*). Following are our comments regarding the Scoping Document 2 (SD2) for the project.

Statement of Interest

SEACC is a coalition of 15 volunteer citizen organizations based in 12 Southeast Alaskan communities, including Petersburg. SEACC's membership includes commercial fishermen, Alaska Natives, small-scale timber operators and value-added wood product manufacturers, tourism and recreation business owners, hunters and guides, and Alaskans from many other walks of life. SEACC is dedicated to preserving the integrity of Southeast Alaska's unsurpassed natural environment while providing for the balanced, sustainable use of our region's resources.

Please note that most of our previous comments on the first scoping document (SD1) were not addressed. We incorporate them again by reference. The most significant of the issues raised is our concern with the purpose and need for this project. The applicant and FERC need to take a hard look at local and regional energy needs and explain how this project helps address those needs. Meeting our local energy needs with clean, affordable and reliable renewable power is more important than exporting power elsewhere.

Due to the unique landscape and climate of Southeast Alaska, there are many potential hydroelectric developments in the region that could produce power with minimal impact on the environment or community use areas. This project is not one of them. It will impact a high value community use area while providing little benefit to local communities.

ALASKA SOCIETY OF AMERICAN FOREST DWELLERS, Point Baker • CHICHAGOF CONSERVATION COUNCIL, Tenakee •
CUSTOMARY & TRADITIONAL GATHERING COUNCIL OF KAKE • FRIENDS OF BERNERS BAY, Juneau • FRIENDS OF GLACIER BAY, Gustavus •
JUNEAU AUDUBON SOCIETY • JUNEAU ALASKA YOUTH FOR ENVIRONMENTAL ACTION • LYNN CANAL CONSERVATION, Haines •
NARROWS CONSERVATION COALITION, Petersburg • LISIANSKI INLET RESOURCE COUNCIL, Pelican • PRINCE OF WALES CONSERVATION LEAGUE, Craig •
SITKA CONSERVATION SOCIETY • TAKU CONSERVATION SOCIETY, Juneau • WRANGELL RESOURCE COUNCIL
•YAKUTAT RESOURCE CONSERVATION COUNCIL

Our remaining comments relate to SD2:

1.) Significant New Change in Project Design.

SD2 represents a significant change to the project design. Although some of these changes could result in less damage to the environment and existing uses of the area, these changes are significantly more substantial than what is to be expected in a second scoping document. A second scoping document is usually intended for refinement of a project proposal. Here, Cascade Creek is essentially proposing a new project design. With the process this far along, we are concerned that significant changes such as this will not receive the appropriate review from the project applicant, regulatory agencies and the public.

2.) Project is not a true Run-of-River.

Cascade Creek LLC claims that the new project design is a “run-of-river” design, meant to mimic natural lake level fluctuations. We do not feel that they have provided the information needed to prove this design is possible.

A true run-of-the-river usually diverts water in river to a power house and back to the river. In this situation stream gauging can be done above the diversion, in the diverted stream reach, and below the outflow. This allows for appropriate control of the amount of water diverted. Cascade Creek LLC is proposing a siphon in Swan Lake that would divert water from the entire reach of Cascade Creek, so gauging of what the natural flow of Cascade Creek during operation would be is impossible. Swan Lake is fed by a large stream, numerous smaller streams, and snowmelt and rainfall in the immediate area around the lake. Cascade Creek LLC has not provided information or a plan to properly gauge all of these inflows, or otherwise determine how to mimic natural stream flows. Reliance on historic average stream flows in Cascade Creek to determine when to release water would be inadequate to address projected stream flows because of changes in timing and type of precipitation events due to climate change, as well as the importance of natural variations in stream flow, especially peak flows.

Finally, the applicant is proposing a system in which water used in power production is not returned to the stream at all. Instead, bypass water will flow into Thomas Bay one quarter mile from the current outflow of Cascade Creek. The impact of this diversion on Cascade Creek, marine life in Thomas Bay, and recreational/scenic attributes of the area is significant and should be studied further.

3.) Impacts to Recreation and Tourism.

The proposed project would divert water from Swan Lake and essentially bypass the entire reach of Cascade Creek. Highly used visitor amenities, including a trail and a Forest Service cabin near Cascade Creek, are popular with local residents and commercial tour operators in large part due to views of impressive cascading waterfalls. These views—as well as views from tour boats of the water fall near the mouth of the stream—would be impacted by the project and have not been adequately studied.

The entire Thomas Bay area is widely used for recreation, tourism, commercial fishing, and other existing uses. We are concerned that the infrastructure, traffic, noise, and industrial development associated with this project will have significant impacts to these existing uses. We do not believe that Cascade Creek LLC has properly evaluated what impacts this development could have on these existing uses. Even where Cascade Creek LLC has tried to study the potential

impacts it has done a poor evaluation. For example, Cascade Creeks LLC's recreation survey inappropriately lumped together responses from the most heavily impacted community, Petersburg, with responses from communities farther away from the project, such as Kake and Wrangell, which do not have immediate access to the area. This gave the impression that the use of the area was lower than it truly is.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Lesh". The signature is written in a cursive, flowing style with a large initial "D".

Dan Lesh
Energy Coordinator

Document Content(s)

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