

Susitna-Watana Hydroelectric Project Document

ARLIS Uniform Cover Page

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March 1, 2013

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Susitna-Watana Hydroelectric Project, FERC Project No. 14241-000;
Submittal of Information Related to Study Plan Determination**

Dear Secretary Bose:

By letter dated January 17, 2013, Staff of the Federal Energy Regulatory Commission (Commission) revised the licensing schedule for the Alaska Energy Authority's (AEA) proposed Susitna-Watana Hydroelectric Project, FERC Project No. 14241 (Project).¹ Primarily, Commission Staff's January 17th letter established a process for its April 1, 2013 issuance of the Study Plan Determination (SPD) for 14 of the individual study plans included in AEA's Revised Study Plan (RSP),² filed with the Commission on December 14, 2012.³ Leading up to Staff's April 1 SPD, the January 17th letter required AEA to prepare and file, following consultation with licensing participants, additional information that Commission Staff have deemed necessary for the April 1 SPD. The purpose of this filing is to submit the information required by Staff's January 17th letter, as well as other relevant information in support of these 14 study plans.

¹ Letter from Jeff C. Wright, Federal Energy Regulatory Commission, to Wayne Dyok, Alaska Energy Authority, Project No. 14241-000 (issued Jan. 17, 2013) [hereinafter, "January 17th Letter"].

² Commission Staff's January 17th letter established April 1 as the SPD date for 13 of the individual studies in the RSP. January 17th Letter, Attachment A. When issuing the SPD for the other individual study plans in the RSP, however, Commission Staff postponed its determination on one additional study until the April 1, 2013 SPD. Letter from Jeff C. Wright, Federal Energy Regulatory Commission, to Wayne Dyok, Alaska Energy Authority, at 3, Project. No. 14241-000 (issued Feb. 1, 2013). In total, the 14 individual studies scheduled for Staff's April 1st SPD consist of the following: (1) Baseline Water Quality (RSP 5.5); (2) Water Quality Modeling Study (RSP 5.6); (3) Mercury Assessment and Potential for Bioaccumulation Study (RSP 5.7); (4) Geomorphology Study (RSP 6.5); (5) Fluvial Geomorphology Modeling Below Watana Dam Study (RSP 6.6); (6) Groundwater Study (RSP 7.5); (7) Ice Processes in the Susitna River Study (RSP 7.6); (8) Fish and Aquatics Instream Flow Study (RSP 8.5); (9) Riparian Instream Flow Study (RSP 8.6); (10) Study of Fish Distribution and Abundance in the Upper Susitna River (RSP 9.5); (11) Study of Fish Distribution and Abundance in the Middle and Lower Susitna River (RSP 9.6); (12) River Productivity Study (RSP 9.8); (13) Characterization and Mapping of Aquatic Habitats (RSP 9.9); and (14) Riparian Vegetation Study Downstream of the Proposed Susitna-Watana Dam (RSP 11.6).

³ Revised Study Plan, Project No. 14241-000 (filed Dec. 14, 2012) [hereinafter, "RSP"].

As required by Commission Staff's January 17th letter, AEA hereby submits the following documents:

Requested Information⁴	Attachment
Final implementation plan for Study of Fish Distribution and Abundance in the Upper Susitna River (RSP 9.5)	Attachment A, <i>Final Susitna River Fish Distribution and Abundance Implementation Plan</i> (March 2013)
Final implementation plan for Study of Fish Distribution and Abundance in the Middle and Lower Susitna River (RSP 9.6)	Attachment A, <i>Final Susitna River Fish Distribution and Abundance Implementation Plan</i> (March 2013)
Final implementation plan for River Productivity Study (RSP 9.8)	Attachment B, <i>Final Susitna River Productivity Study Implementation Plan</i> (March 2013)
Final focus areas for 2013 middle and lower river studies	Attachment C, <i>Technical Memorandum, Selection of Focus Areas and Study Sites in the Middle and Lower Susitna River for Instream Flow and Joint Resource Studies – 2013 and 2014</i> (March 2013)

As directed in Staff's January 17th letter, AEA on January 31, 2013, filed drafts of all these documents with the Commission and distributed them to licensing participants via its licensing website, <http://www.susitna-watanahydro.org/meetings/>. Also in conformance with Staff's January 17th letter, AEA held technical workgroup (TWG) meetings on February 14th and 15th "to discuss the study results, proposed implementation plans, and selected focus areas in the middle and lower Susitna River."⁵ Because Staff of the National Marine Fisheries Service (NMFS) were unavailable to meet on February 14-15 due to a preexisting scheduling conflict, AEA met separately with NMFS on February 7th and 8th to review these materials.

In accordance with Commission Staff's revised licensing schedule, licensing participants may file comments on the attached implementation plans and technical memorandum—as well as the 14 studies subject to Staff's April 1st RSP⁶—by March 18, 2013.⁷ Based on the technical information discussed in the February 7-8 and 14-15 meetings, AEA has made changes to the attached implementation plans and technical memo since the drafts of these were filed and distributed on January 31.

AEA also has attached two additional documents related to Commission Staff's April 1st SPD. First, based on RSP comments filed by the Alaska Department of

⁴ See January 17th Letter, Attachment A, at 5.

⁵ *Id.*

⁶ These 14 individual study plans can be found in AEA's RSP, filed with the Commission on December 14, 2012. See *supra* note 2. The RSP can be accessed from the Commission's eLibrary system or AEA's licensing website, <http://www.susitna-watanahydro.org/type/documents/>.

⁷ See January 17th Letter, Attachment A, at 5.

Environmental Conservation (DCE),⁸ AEA has prepared and included as Attachment D an updated Quality Assurance Project Plan (QAPP) for the Baseline Water Quality Study (RSP 5.5).⁹ The attached QAPP has been updated to conform with DEC's *Quality Assurance Plan Review Checklist* and *Draft Guidance for a Tier 2 Water Quality Monitoring QAPP*.¹⁰ Second, as discussed in the meetings with NMFS on February 7-8 and the TWG on February 14-15, AEA has prepared and attached as Attachment E a response to interim comments submitted by NMFS and the U.S. Fish and Wildlife Service on Characterization and Mapping of Aquatic Habitat Mapping Revised Study Plan (RSP 9.9), including a comparison table demonstrating that there is no significant difference between AEA's habitat classification system and the classification system promoted by the resource agencies.

As always, AEA appreciates the participation and commitment to this licensing process demonstrated by Commission Staff, federal and state resource agencies, and other licensing participants. Following Commission Staff's April 1st SPD, AEA looks forward to working with licensing participants and Commission Staff in implementing the approved studies, which AEA believes will comprehensively investigate and evaluate the full range of resource issues associated with the proposed Project and support AEA's license application, scheduled to be filed with the Commission in 2015.

If you have questions concerning this submission please contact me at wdyok@aidea.org or (907) 771-3955.

Sincerely,



Wayne Dyok
Project Manager
Alaska Energy Authority

Attachments

cc: Distribution List (w/o Attachments)

⁸ State of Alaska Resource Agency RSP Comments, Project No. 14241-000, at 3-6 (filed Jan. 18, 2013) [hereinafter, "DEC RSP Comments"].

⁹ See RSP § 5, Attachment 5-1.

¹⁰ DEC RSP Comments, Attachments 1 & 2.