

June 3, 2014

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

Re: Susitna-Watana Hydroelectric Project, Project No. 14241-000

## Filing and Distribution of Initial Study Report

Dear Secretary Bose:

In accordance with Section 5.15(c) of the Integrated License Process (ILP regulations of the Federal Energy Regulatory Commission (Commission or FERC), the Alaska Energy Authority (AEA) is pleased to file the enclosed Initial Study Report (ISR) for the Commission's licensing of the Susitna-Watana Hydroelectric Project, FERC Project No. 14241 (Project). The purpose of this ISR is to report on AEA's progress in implementing the Commission-approved Study Plan for the Project through the 2013 study season, and to establish AEA's plans for completing the Study Plan during the 2014 and 2015 study seasons.

Since the Commission's study plan determinations issued in February and April 2013, AEA has proceeded to implement the Study Plan approved by the Commission. The ISR details AEA's progress with each of the 58 individual studies. Specifically, for each study, the ISR:

- Reports on the methodologies employed and the results achieved through the 2013 study season;
- Identifies variances in methodologies from the Commission-approved Study Plan employed in 2013, including for each variance an explanation of how AEA is meeting study objectives in light of such variances;
- Evaluates how the data collected through the 2013 study season compare to historical scientific data in the Project area;
- Describes the modifications to the Study Plan that AEA will employ when completing the Study Plan in 2014 and 2015; and
- Specifies AEA's plans for the 2014 and 2015 study seasons.

<sup>&</sup>lt;sup>1</sup> See Study Plan Determination for the Susitna-Watana Hydroelectric Project, Project No. 14241-000 (issued Feb. 1, 2013); Study Plan Determination on 14 Remaining Studies for the Susitna-Watana Hydroelectric Project, Project No. 14241-000 (issued Apr. 1, 2013); Director's Formal Study Dispute Determination, Project No. 14241-000 (issued Apr. 26, 2013).

Consistent with its assurances to Commission staff and licensing participants that its prior distribution of a draft ISR earlier this year would seek to avoid a duplication of effort upon the filing of the final ISR,<sup>2</sup> AEA has structured the ISR to segregate new content from the content that licensing participants already have received in the draft ISR. Specifically, for each of the individual studies, Part A reproduces the contents of the draft ISR.<sup>3</sup> Part B includes any new supplemental information or errata with respect to Part A. Finally, Part C includes an updated executive summary for the study, as well as new material detailing AEA's plans for completing the study.<sup>4</sup>

The ISR begins with a brief overview document, which summarizes the progress made to date in the licensing of the Project and includes a description of AEA's methodology for developing its plans for a limited study season in 2014. As explained in the overview document, AEA's 2014 limited study program will focus on essential gap-filling studies; continued monitoring and surveys reliant upon equipment already deployed (e.g., wildlife monitoring); time-consuming modeling work; and studies in which licensing participants have largely agreed on the scope, methods, and level of effort.

In accordance with the Commission's Integrated Licensing Process regulations and the licensing schedule for this Project, licensing participants have an extended period of approximately 135 days <sup>5</sup>—significantly longer than the 15 days provided under the Commission's ILP regulations <sup>6</sup>—to review the ISR before AEA holds a series of meetings on the ISR, which will begin the week of October 13. The dates for these meetings appear in the attached ISR overview document, and additional details on these meetings will be posted to the "Meetings" tab of the Project website, <a href="http://www.susitna-watanahydro.org/meetings/">http://www.susitna-watanahydro.org/meetings/</a>, closer to the meeting dates.

Following the ISR meetings, AEA will file a meeting summary, and licensing participants will have until November 30, 2014 to file comments on the ISR meeting summary, including any proposed new or modified studies.

This ISR was greatly aided by the extensive involvement and technical input provided by Commission staff, federal and state resource agencies, Alaska Native regional and village corporations, environmental organizations, individuals, and other licensing participants. The exchange of information during quarterly Technical Workgroup meetings, combined with numerous informal collaborative meetings and consultation, has strengthened AEA's implementation of the Study Plan. AEA

\_

<sup>&</sup>lt;sup>2</sup> See Draft Initial Study Report, Project No. 14241-000 (filed Feb. 3, 2014).

Other than removing the executive summary, removing the "draft" designation, and other administerial changes, AEA made no changes to the contents of Part A since the draft ISR.

The only exception to this structure is the Glacial and Runoff Changes Study (Study 7.7), which is now a completed study report.

<sup>&</sup>lt;sup>5</sup> See Letter from Jeff Wright, Federal Energy Regulatory Commission, to Wayne Dyok, Alaska Energy Authority, Project No. 14241-000 (issued Jan. 28, 2014).

<sup>&</sup>lt;sup>6</sup> 18 C.F.R. § 5.15(c)(2).

appreciates the active interest and involvement of all licensing participants and looks forward to this ongoing engagement as AEA works to complete the Study Plan and prepare its license application for the Project.

Due to the size of the ISR, AEA is not distributing paper copies. Rather, licensing participants can access the ISR at the Project's website, <a href="http://www.susitna-watanahydro.org/">http://www.susitna-watanahydro.org/</a>, under the "Documents" tab. In addition, the ISR can be accessed on the Commission's eLibrary system, <a href="http://www.ferc.gov/docs-filing/elibrary.asp">http://www.ferc.gov/docs-filing/elibrary.asp</a>, under Docket No. P-14241. All available datasets generated in support of the ISR can be accessed at <a href="http://gis.suhydro.org/reports/isr">http://gis.suhydro.org/reports/isr</a>. Upon request, AEA will provide the ISR and available datasets in CD format.

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

Wayne MP yok

Enclosure

cc: Distribution List (w/o Enclosure)

## **Distribution List**

Kathryn Martin Ahtna, Inc. P.O. Box 649

Glennallen, AK 99588

Andy Moderow Executive Director Alaska Conservation Alliance P. O. Box 100660 Anchorage, AK 99510

David Theriault Alaska Conservation Alliance P.O. Box 100660 Anchorage, AK 99510

Susan K. Bell
Commissioner
Alaska Department of Commerce
Community and Economic Development
P. O. Box 110804
Juneau, AK 99811-0800

Larry Hartig ADEC, Office of the Commissioner P. O. Box 111800 410 Willoughby Ave., suite 303 Juneau, AK 99811-1800

Brenda Krauss ADEC, Division of Water P. O. Box 111800 410 Willoughby Ave., Suite 303 Juneau, AK 99811-1800

Kate Kanouse Habitat Biologist ADF&G, Division of Habitat P. O. Box 240020 Douglas, AK 99824-0020 Ken Johns President / CEO Ahtna, Inc. P. O. Box 649 Glennallen, AK 99588

Polly Carr Executive Director Alaska Center for the Environment 921 W 6th Avenue, Suite 200 Anchorage, AK 99501

Julie Jessen Alaska Conservation Alliance 441 W 5th Street, Suite 402 Anchorage, AK 99501-2340

Dan Easton
Director
Alaska Department of Environmental Conservation
P.O. Box 111800
410 Willoughby Ave, Suite 303
Juneau, AK 99811-1800

Bill Griffith ADEC, Division of Water 555 Cordova Street Anchorage, AK 99501-2617

William Ashton
Storm Water & Wetlands Manager
ADEC, Division of Water
P.O. Box 111800
410 Willoughby Ave., Suite 303
Juneau, AK 99811-1800

Monte Miller Hydroelectric Project Coordinator ADF&G, Division of Habitat 333 Raspberry Road Anchorage , AK 99518 Anne Johnson

Natural Resources Manager

Alaska Department of Natural Resources

550 W 7th Ave, Suite 650 Anchorage, AK 99501-3579

Joseph R. Balash Deputy Commissioner

**ADNR** 

550 W 7th Ave., Suite 1400 Anchorage, AK 99501-3579

Wyn Menefee Director

ADNR

Division of Mining, Land and Water

550 W 7th Ave., Suite 1070 Anchorage, AK 99501-3579

**Gary Prokosch** 

Natural Resource Manager

**ADNR** 

Division of Mining, Land and Water

550 W 7th Ave., Suite 1020 Anchorage, AK 99501-3579

Ben Ellis Director ADNR

Division of Park and Outdoor Recreation

550 W 7th Ave., Suite 1380 Anchorage, AK 99501-3561

Richard VanderHoek

**ADNR** 

Office of History and Archaeology 550 W 7th Ave., Suite 1310 Anchorage, AK 99501-3565

Marie Steele

**Project Coordinator** 

ADNR

Office of Project Management and Permitting

550 W 7th Ave. Suite 1430 Anchorage, AK 99501-3577 Daniel S. Sullivan Commissioner

ADNR

P. O. Box 111000

400 Willoughby Ave., Suite 500

Juneau, AK 99811-1000

Tom Crafford

Director

**ADNR** 

Office of Project Management and Permitting

550 W 7th Ave., Suite 1400 Anchorage, AK 99501-3579

Kristina "Krissy" Plett

Natural Resource Manager

ADNR

Division of Mining, Land and Water

550 W 7th Ave., Suite 1020 Anchorage, AK 99501-3579

Candice Snow

Permits ADNR

Division of Mining, Land and Water

550 W 7th Ave., Suite 900C Anchorage, AK 99501-3579

Judith Bittner

State Historic Preservation Officer

**ADNR** 

Office of History and Archaeology

550 W 7th Ave., Suite 1310 Anchorage, AK 99501-3565

**Rod Combellick** 

**ADNR** 

Division of Geological & Geophysical Surveys

3354 College road Fairbanks, AK 99709

Ethan Birkholz

Chief of Planning

Alaska Department of Transportation & Public Facilities

Northern Region Planning 2301 Peger Rd., MS-2550 Fairbanks, AK 99709 Ben White Alaska Department of Transportation & Public Facilities Statewide Environmental Management Office P.O. Box 112500 3132 Channel Drive Juneau, AK 99811-2500

Mark Huber Alaska Fly Fishers 200 W 34th Ave., No. 1233

Joseph R. Henri Alaska Ratepayers P. O. Box 210556 Anchorage, AK 99521

Anchorage, AK 99503

Judy Price Alaska Survival Coalition for Susitna Dam Alternatives P. O. Box 602 Talkeetna, AK 99676

Brett Swift American Rivers 317 SW Alder St. Portland, OR 97204

Harold Shephard The Center for Water Advocacy P. O. Box 15332 Anchorage, AK 99603

Doug Wade Chickaloon Native Village P. O. Box 1105 Chickaloon, AK 99674 Emily Ford Public Outreach Liaison Alaska Energy Authority 813 W. Northern Lights Blvd Anchorage, AK 99503

Marilyn Leland Executive Director Alaska Power Association 703 W Tudor Rd., Suite 200 Anchorage, AK 99503-6650

Alaska Ratepayers P O box 670287 Chugiak, AK 99567

John Seebach American Rivers 1101 14th St., SW, Suite 1400 Washington, DC 20005

Thomas O'Keefe PNW Director American Whitewater 3537 NE 87th St Seattle, WA 98115

Peg Foster Chase Community Council P. O. Box 205 Talkeetna, AK 99676

Chitina Native Corporation P. O. Box 3 Chitina, AK 99566

Becky Long Coalition of Susitna Dam Alternatives P. O. Box 320 Talkeetna, AK 99676 Bob Shavelson Cook Inlet Keeper P.O. Box 3269 Homer, AK 99603

Sophie Minich
President and CEO
Cook Inlet Region Corporation (CIRI)
P. O. Box 933330
Anchorage, AK 99509-3330

Jason Moore Director of Communications CIRI P. O. Box 933330 Anchorage, AK 99509-3330

Ethan Schutt, Sr.
Senior Vice-President for Land and Energy
CIRI
Land and Energy Development
P. O. Box 933330
Anchorage, AK 99509-3330

Rachel Day P. O. Box 921 Talkeetna, AK 99676

Denali Borough P. O. Box 480 Healy, AK 99743 James Mery, Sr.
Vice President of Land & Natural Resources
Doyon, Ltd.
1 Doyon Place, Suite 300
Fairbanks, AK 99701-2941

Eklutna, Inc. 16515 Centerfield Dr., Suite 201 Eagle River, AK 99577 Eklutna Native Village 26339 Eklutna Village Road Chugiak, AK 99567

Federal Emergency Management Agency 130 228th St. SW. Bothell, WA 98021-8627 Fairbanks Northstar Borough P. O. Box 71267-1267 Fairbanks, AK 99701

Edward Perez Regional Engineer FERC Portland Regional Office 805 SW Broadway, Suite 550 Portland, OR 97205 Kimberly Bose Secretary FERC 888 First Street NE Washington, DC 20426 David Turner FERC 888 First Street NE Washington, DC 20426 Kim Nguyen FERC 888 First Street NE Washington, DC 20426

Kim Ognisty FERC Office of General Counsel 888 First Street NE Washington, DC 20426

James Ferguson P. O. Box 15391 Fritz Creek, AK 99603

William FitzGerald PO Box 93 Talkeetna, AK 99676 Joseph Klauder P. O. Box 396 Talkeetna, AK 99676

Debra Call Knik Tribal Council P. O. Box 871565 Wasilla, AK 99567 Tom Harris Knikatnu, Inc. P. O. Box 872130 Wasilla, AK 99687

Raymond Theodore President Knikatnu Native Corporation P. O. Box 872130 Wasilla, AK 99687-7476 Shannon Post Director Matanuska-Susitna Borough 350 E. Dahlia Ave. Palmer, AK 99645

Joe Griffith General Manager Matanuska Electric Association P. O. Box 2929 Palmer, AK 99645 Larry Engel Matanuska-Susitna Borough 350 E Dahlia Ave. Palmer, AK 99645

Larry DeVilbiss Mayor Matanuska-Susitna Borough 350 E Dahlia Ave. Palmer, AK 99645

Mendas Cha-ag Native Corporation 457 Cindy Drive Fairbanks, AK 99701 Thomas Meyer Attorney Advisor NOAA Office of the Alaska Regional Counsel P. O. Box 21109 709 W 9th St., Room 909A Juneau. AK 99802-7414

Mandy Migura NOAA-NMFS Alaska Regional Office 222 West 7th Ave., Box 43 Anchorage, AK 99513

Kate Savage Energy Coordinator NOAA-NMFS P. O. Box 21668 709 W 9th Street Juneau, AK 99802

Jan Konigsberg Alaska Hydro Project 7511 Labrador Circle Anchorage, AK 99502

Native Village of Tetlin P. O. Box TTI Tok, AK 99779

Katherine Poole Natural Resource Defense Council 111 Sutter Street, 20th floor San Francisco, CA 94104

Native Village of Tazlina P. O. Box 87 Glennallen, AK 99588 Susan Walker NOAA-NMFS Alaska Regional Office P.O. Box 21668 709 W 9th Street Juneau, AK 99802

Kathryn Kempton NOAA Office of General Counsel 501 W Ocean Blvd., Suite 4470 Long Beach, CA 90802

Native Village of Kluti Kaah P. O. Box 68 Cooper Center, AK 99573

Pat Lavin National Wildlife Federation 750 W 2nd Ave., Suite 200 Anchorage, AK 99501

Native Village of Gakona P. O. Box 102 Gakona, AK 99585

Noah Garrison Natural Resource Defense Council 1314 2nd Street Santa Monica, CA 90401

Native Village of Tyonek P. O. Box 82009 Tyonek, AK 99682 Michael C. Geraghty The Honorable Attorney General of Alaska P. O. Box 110300 Juneau, AK 99811-0300

Sean Parnell
The Honorable
Governor of Alaska
P. O. Box 110001
Juneau, AK 99811-0001

Mark Neuman
The Honorable
Alaska State Legislature
House of Representatives
600 E Railroad Ave.,
Suite 1
Wasilla. AK 99654
Cathy Teich
P. O. Box 155
Talkeetna, AK 99676

Randall Hagestein Alaska State Director The Nature Conservancy 715 L Street Suite 100 Anchorage, AK 99801

Tim Bristol
Director
Trout Unlimited
Alaska Office
419 6th St., Suite 200
Juneau, AK 99801

Constance Twigg P. O. Box 266 Talkeetna, AK 99676 Brian Bjorkquist Attorney General's Office 1031 W 4th Ave., Suite 200 Anchorage, AK 99501

Charlie Huggins
The Honorable
Alaska State Legislature, State Senate
600 E Railroad Ave.,
Suite 1
Wasilla, AK 99654

Tanacross Village Council P. O. Box 76009 Tanacross, AK 99776

Tetlin Native Corporation P. O. Box 652 Tok, AK 99780

Shawn Stankowitz Trapper Creek Community Council P. O. Box 13021 Trapper Creek, AK 99683

Kathryn Miller Trout Unlimited 227 SW Pine Street Suite 200 Portland, OR 97201

Steve Taylor
CFO
Tyonek Native Corporation
1689 C Street
Suite 219
Anchorage, AK 99501

Heidi Firstencel Field Office Manager USACOE Alaska District P.O. Box 6898 JBER, AK 99506-0898

William A. Keller USACOE P.O. Box 6898 JBER, AK 99506-0898

Michael Baffrey US Department of Interior 1689 C Street, Suite 100 Anchorage, AK 99501

Eric Marchegiani USDA Rural Development 800 W Evergreen Suite 201 Palmer, AK 99645

Ken Lord US Department of Interior 4230 University Dr Suite 300 Anchorage, AK 99508

Renee Fenci USDOI – BLM 222 W 7th Ave., No. 13 Anchorage, AK 99507

John Jangala USDOI – BLM P. O. Box 147 Mile Post 186.5 Glenn Hwy Glennallen, AK 99588 Shannon Morgan USACOE Alaska District P. O. Box 6898 JBER, AK 99506-0898

Robert N. Jones USDA Natural Resources Conservation Service 800 W Evergreen Ave. Suite 100 Palmer, AK 99645-6539

Michiel Holly USACOE Alaska District P.O. Box 6898 JBER, AK 99506-0898

Ricky Hoff USDOI Bureau of Indian Affairs P. O. box 21647 709 W 9th St. Juneau, AK 99802

Gary Reimer USDOI – BLM 4700 BLM Road Anchorage, AK 99507

Elijah Waters USDOI – BLM P. O. Box 147 Mile Post 186.5 Glenn Hwy Glennallen, AK 99588

Ann Rappoport USDOI Fish and Wildlife Service 605 W 4th St., Room G-61 Anchorage, AK 99501 Lisa Holzapfel USDOI National Park

National Park Service 240 W 5th Ave

Anchorage, AK 99501

Willie Taylor USDOI

**Environmental Policy and Compliance** 

1849 C Street NW

MS 2462

Washington, DC 20240

**Douglas Mutter** 

USDOI

**Environmental Policy and Compliance** 

1689 C Street Room 119

Anchorage, AK 99501-5126

Lisa Murkowski The Honorable

709 Hart Senate Office Building Washington, DC 20515-0201

Village of Dot Lake P.O. Box 2279 Dot Lake, AK 99737

Frank Yadon PO Box 1022

Talkeetna, AK 99676

John Strasenburgh 15406 E Barge Dr P. O. Box 766 Talkeetna, AK 99676 Paul Anderson

**USDOI** 

National Park Service

P. O. Box 9

Denali National Park and Service

Denali Park, AK 99755

David Meyer USDOI – USGS

4210 University Drive Anchorage, AK 99508

Pamela Bergmann

**USDOI** 

**Environmental Policy and Compliance** 

1689 C Street Room 119

Anchorage, AK 99501-5126

Don Young The Honorable

2314 Rayburn House Office Building Washington, DC 20515-0201

Mark Begich The Honorable

111 Russell Senate Office Building Washington, DC 20510-0201

Robert Gerlach 1366 E 2nd St P. O. Box 23

Talkeetna, AK 99676

Kevin Foster Mile 230.7 Alaska Railroad Talkeetna, AK 99676 Beth Pike P. O. Box 968

Talkeetna, AK 99676

**Denis Ransy** P. O. Box 344 Talkeetna, AK 99676

Paul Roderick President Talkeetna Air Taxi PO Box 73 Talkeetna, AK 99676

Michael Wood P. O. Box 773 Talkeetna, AK 99676

**Robert Coleman** President Susitna Community Co HC 89, Box 8575 Talkeetna, AK 99676

William Post P. O. Box 271 Talkeetna, AK 99676

**Sharon Corsaro Corsaro Creative Coaching** P. O. Box 255 Hermosa Beach, CA 90254

Ruth D. Wood PO Box 766 Talkeetna, AK 99676

Alaska Center for the Environment 921 W 6th Avenue, Suite 200 Anchorage, AK 99501

Sheryl Salasky P. O. Box 196 Talkeetna, AK 99676

Charlie Loeb President **Denali Citizens Council** P. O. Box 78 Denali Park, AK 99755

Cliff Eames **Cooper County Alliance** HC 60, Box 306T Copper Center, AK 99573

**Cassie Thomas Program Analyst National Park Service** 11081 Glazanof Dr. Room 108 Anchorage, AK 99507 Jeremy Millen **Executive Director** Friends of Mat-Su 308 E Dahlia St. Palmer, AK 99645

Lissa Hughes Northern Alaska Environmental Center 803 College Road Fairbanks, AK 99701

Joshua Sonkiss 1024 21st Ave Fairbanks, AK 99701

Ellen Wolf Talkeetna Defense Fund P. O. Box 371 Talkeetna, AK 99676

Michael Buntjer Fish and Wildlife Biologist USFW Service AFWFO 605 W 4th Ave. Anchorage, AK 99501

Richard Roos-Collins Principal Water and Power Law Group PC 2140 Shattuck Ave Suite 801 Berkeley, CA 94704-1229

Jason Berkner U.S. Army Corps of Engineers-Alaska District P.O. Box 6898 JBER, Alaska 99506-0898 Karen Kelly Executive Director Northern Alaska Environmental Center 830 College Road Fairbanks, AK 99701

Sharon Montagnino Chairperson Talkeetna Community Council, Inc. P. O. Box 608 Talkeetna, AK 99676

Corinne Smith
Mat-Su Basin Program Director
The Nature Conservancy of Alaska
715 L Street
Suite 100
Anchorage, AK 99501

Liz Robinson Executive Director Envision Mat-Su PO BOX 119 Palmer, AK 99645

Mike Holly US Army Corps of Engineers, Alaska District 1600 A Street, Suite 110 Anchorage, Alaska 99501