Duff Mitchell, Business Manager
Juneau Hydropower, Inc,
P.O. Box 22775
Juneau, AK 99802

Dear Mr. Mitchell:

Re: Scoping Comments, Sweetheart Lake Hydroelectric Project, FERC P-13563-001

The following comments are provided by the National Park Service (NPS) Hydropower Assistance Program, Alaska Region on the Scoping Document 1 (SD1) for the Sweetheart Lake Hydropower Project (FERC No. P-13563). These comments are made pursuant to the NPS authority to consult with the Federal Energy Regulatory Commission (FERC) and applicants concerning a proposed project's effects on outdoor recreation and natural resources under the Federal Power Act (18 CFR 4.38(a), 4.51(f)(4)-(6), and 16.8(a)); the Outdoor Recreation Act; and the Wild and Scenic Rivers Act. We are requesting that certain studies of resources in the project area be undertaken to help provide sufficient information for FERC, resource agencies, and the public to assess the likely impact of the project on these resources and to develop appropriate resource protection, mitigation and enhancement measures.

As identified in the SD1, the project would involve a 500-foot long, 90-foot high concrete and rock face dam at the natural outlet of Lower Sweetheart Lake that would create a 1,635-acre impoundment. This elevation of this reservoir would vary by as much as 60 feet. A nine-foot diameter, 1,650-foot long penstock tunnel from the impounded lake would feed into a 30MW powerhouse. A bypass reach would be created in Lower Sweetheart Creek, and tailrace waters would be returned to the creek downstream of this reach. Transmission lines would consist of either about nine miles of overhead lines or a combination of mostly buried lines with less than a half mile of overhead lines, plus a submarine cable to connect into the regional grid. A new dock on Gilbert Bay and access road to the powerhouse would be needed, while access to the dam construction site would be through the tunnel and by helicopter. Annual average generation from the project would be approximately 136 Gigawatt-hours. The Alternative Licensing Procedure (ALP) was approved for the project by FERC on September 24, 2010.
NPS was unable to attend the September 2011 Scoping Meeting or site visit, and the transcript from the meeting has not yet been filed with FERC or posted to the project website. Thus our comments on the SD1 may be duplicative of comments made by other resource agencies, e.g. the USFS. In the interests of a thorough scoping of project-related issues, and the development of appropriate study plans to address all these issues, NPS offers the following comments:

1) Aesthetics Studies

As previously discussed in our November 1, 2010 comment letter on the Pre-Application Document (PAD), the aesthetic effects of reduced flows over the barrier falls and cascades near the mouth of Sweetheart Creek should be evaluated. This can be done by photographing and/or videotaping natural flows over the falls at various flow rates, including high flows and the lower flows that are likely to predominate once the project is operating. Aesthetic flow releases may be among the PMEs recommended for this project.

2) Recreational Studies

The SD1 states that “JHI will use information obtained from guides and outfitters . . . to obtain areas of concern for recreational users of Gilbert Bay and Sweetheart Creek . . .”. (p. 34). NPS strongly recommends that in addition to guides and outfitters, representatives of all classes of recreational users of the area, including private or independent visitors, be surveyed to determine the kinds of recreational opportunities they seek in the area.

Thank you for your consideration of our comments. We look forward to working with Juneau Hydropower, FERC, and others to ensure appropriate consideration of the proposed project’s impacts. Should you have any questions about our comments, please contact Cassie Thomas, Program Analyst, at (907) 350-4139 or cassie_thomas@nps.gov.

Sincerely,

Joan Darnell
Team Manager
Environmental Planning and Compliance