



United States Department of the Interior
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

L7425 (AKRO-EPC)

NOV 01 2010

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

Dear Mr. Mitchell:

The following comments are provided by the National Park Service (NPS) Hydropower Assistance Program, Alaska Region on the Pre-Application Document (PAD) for the Sweetheart Lake Hydropower Project (FERC No. P-13563). These comments are made pursuant to the NPS authority to consult with the FERC and applicants concerning a proposed project's affects 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 also requesting that certain studies of resources in the project area be undertaken to help provide sufficient information for the 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 PAD, 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. The elevation of the 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 probably be by helicopter. Annual average generation from the project would be approximately 136 Gigawatt-hours.

In general, the PAD does a thorough job of outlining the likely project impacts and kinds of studies that will be needed. However, given the high level of recreation resource value for the area (p. 40), it is surprising there are no studies suggested under the "Preliminary

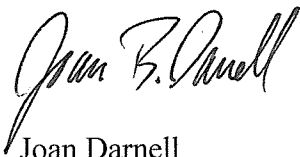
Issues and Studies List” (p. 58). Given the project site’s proximity to Gilbert Bay, which sees high recreational use, NPS suggests that recreational studies will be needed, in particular to explore the impacts the area’s increased accessibility and altered developmental character will have on recreational opportunities. While some aspects of recreational use are addressed under other headings (e.g. the impact of greater access on area wildlife due to increased hunting, and potential changes in the personal use sockeye fishery), this important issue deserves its own section in the Scoping Document to be prepared by FERC in consultation with the applicant, resource agencies, and public. JHI should plan to expend significant effort quantifying existing recreational opportunities in the vicinity of the project, and assessing potential impacts.

Under the section headed “Aesthetics,” (p. 63) the PAD omits consideration of the impacts of reduced or eliminated flows on Sweetheart Falls, the series of cascades and waterfalls almost 450 feet high that will form the bypass reach if the project is built. Likewise, the visual impact of the large dam should be assessed. The impacts of increased noise during the construction phase, particularly if helicopters are utilized to bring materials, personnel and equipment to the dam site should be addressed under this heading or under a separate heading.

Under “Socioeconomics,” (p. 64), the project’s impacts on public and commercial recreation and on the value of the area’s natural resources (e.g. fish and wildlife harvested for consumption) should also be assessed.

Thank you for your consideration of our comments. We look forward to working with you and other parties to ensure appropriate consideration of the proposed project’s impacts. If 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

cc:
FERC, eFile (P-13563)