

From: Weishahn [mailto:weis@aptalaska.net]

Sent: Monday, July 09, 2012 8:56 PM

To: Jamie Heinz; Julie Cozzi

Subject: Comment: Agenda item 11C(1), Licensing Process for the Connelly Lake Hydroelectric Project

Hello Jamie or Julie,

Please provide a hard copy of my letter to assembly members and the mayor before the July 10, 2012, Assembly meeting.

Thank you,

Carolyn Weishahn

~~~~~  
July 9, 2012

To: Haines Borough Assembly Members, Borough Mayor

From: Carolyn Weishahn

Re: Agenda item 11C(1), Licensing Process for the Connelly Lake Hydroelectric Project

As we as a community participate in evaluating the proposed hydro project at Connelly Lake, it behooves our borough leaders to advocate for the most transparent, predictable licensing process that ensures resource protection, and provides for maximum public participation during the pre-filing consultation period. According to the FERC Handbook, the Integrated Licensing Process (ILP) "provides a predictable, efficient, and timely licensing process that continues to ensure resource protection." The ILP also increases "public participation in pre-filing consultation." (see excerpt below)

[excerpt FERC Handbook, page iii]

"The ILP became effective October 23, 2003. The ILP provides a **predictable, efficient, and timely licensing process that continues to ensure resource protection**. It is designed to improve efficiency and timeliness of preparing and processing license applications by: combining a potential license applicant's pre-filing consultation with the Commission's scoping pursuant to the National Environmental Policy Act (NEPA), rather than conducting these activities sequentially; **increasing public participation in pre-filing consultation**; improving coordination between the Commission's processes and those of other participants; providing for increased staff assistance during the preparation of the application; and establishing schedules for all participants, including Commission staff."

Given the controversial nature of this hydro proposal, the high value fish and wildlife habitat of the Chilkoot River valley that supports subsistence, sport, and commercial fishing and hunting, the Bald Eagle Preserve in the Chilkoot, Alaska Native interests in this area, and the need for comprehensive studies of the impacts of such a project, I believe the ILP best serves the public interest and of the three licensing processes is the most appropriate one for the Connelly Lake hydro proposal.

We have already seen several missteps by Goat Lake Hydro (GLH): the first public notice in the Chilkat Valley News announcing GLH's request to FERC for a waiver from the default ILP and request to use the TLP was declared deficient by FERC and had to be re-published; GLH scheduled scoping meetings in different towns for agency input and Haines input when FERC procedures specify a joint meeting; these meetings were held before the request for a waiver

from the ILP had even been decided; GLH also scheduled a site visit before the waiver request was decided but I believe this has been postponed; GLH gave inaccurate information in its PowerPoint presentation at the public hearing in Haines regarding the ILP: “allows the Applicant (GLH) to write their own Environmental Assessment.” (FERC does the Environmental Assessment for both the ILP and TLP)

The ILP provides for early study dispute resolution that is binding on the applicant. We rely on public agency biologists to review the Study Plan and possibly dispute the adequacy of the Study Plan. Binding resolution of study disputes is in everybody’s best interest.

I hope the borough assembly steps up and supports the FERC Integrated Licensing Process. The Chilkoot watershed is irreplaceable and deserves the most comprehensive, thorough licensing process.

Sincerely,  
Carolyn Weishahn



From: Patty Brown [mailto:pattyb@aptalaska.net]

Sent: Monday, July 09, 2012 3:24 PM

To: ~~Stephanie Scott, Daymond Hoffman, Steve Vick, Debra Schnabel, Joanne Waterman, Norm Smith, Jerry Lapp~~

Stephanie Scott

Daymond Hoffman, Steve Vick, Debra Schnabel,

Subject: Re Connelly Lake Proposal

Joanne Waterman, Norm Smith, Jerry Lapp

9 July 2012

My name is Patty Brown, 17-year resident of Haines. My Bachelor's Degree is in Natural Resources Management and, as I was in college in the 1970's, I am acutely familiar with both the reasons and the processes in place today to minimize negative impacts of resource development in the public interest. The concept and procedures inherent in Environmental Impact Statements were first developed way back then. My training, as well as ALL decisions of this sort, required consideration of both the natural community and human community.

Furthermore, as a science teacher, I promote in my students an understanding of how objectivity must be applied in answering questions scientifically. Elected officials have to have that understanding also.

The questions that must be posed when determining the suitability of the Connelly Lake hydropower project have not been researched. Previous data gathered regarding fish returns and wildlife is useful and, in fact, its existence illustrates the point that people have LONG been interested in the welfare of these resources. However, there is much more to investigate. Effect of water temperature changes, presence of noise, earthquake impact modeling and variations in potential impacts over the seasons are some examples.

It is truly shocking that detouring around the most rigorous licensing process is even an option in the case of developing a water impoundment facility in the Chilkoot Watershed. Both science and the indisputable dependence of the local economy dictate that research and public process be done without ANY shortcuts applied. Fast-tracking the licensing serves only one party: the energy company.

Once valid scientific data is collected, then community priorities are applied. That's how wise decisions are made. Cutting corners will not result in a product that is healthy for the ecosystem or the economy.

Please support the motion to insist that the FERC use the Integrated Licensing Process in considering the Connelly Lake Project.

Thank you for your work in making the best decisions for our community and the habitat we cherish.

Patty Brown

**From:** Peter Goll [mailto:[psgoll@yahoo.com](mailto:psgoll@yahoo.com)]  
**Sent:** Tuesday, July 10, 2012 5:47 PM  
**To:** Julie Cozzi  
**Subject:** Please provide to assembly

Dear Assembly Member,

Please support a full public process (ILP) regarding determinations on power development at Connelly Lake.

This project has significant impact on the people of Haines, conflicting with existing commercial and subsistence activities and warrants the most thorough investigation and opportunity for public comment.

There are alternative sites where less stringent review might be in order, but Connelly Lake is not one of these.

Thank you.

Peter Goll

**Jamie Heinz**

Daymond Hoffman, Steve Vick,  
Debra Schnabel,

**From:** Carol Tuynman [ctuynman@gmail.com]  
**Sent:** Monday, July 09, 2012 9:35 PM  
**To:** Mark Earnest; ~~Daymond Hoffman; Steve Vick; Joanne Waterman; Norm Smith; Jerry Lapp~~  
**Cc:** Stephanie Scott  
**Subject:** Support Mayor's recommendation for ILP on Connelly Lake proposal

To: Honorable Haines Borough Assembly Members and Borough Manager:

I respectfully request your support of Mayor Stephanie Scott's studied and carefully researched recommendation that "the Borough Assembly go on record with FERC stating that both the complexity and level of potential controversy inherent in this project call of utilization of the Integrated Licensing Process. In this case, the more regulated Process (ILP), conducted by a third party (FERC), may prove to benefit the project.

Contrary to justifying the request to use the TLP by addressing the 6 factors, the applicant, Goat Lake Hydro addressed, but failed to adequately justify the six factors in it's request for authorization to use the TLP:

1. **Timeliness:** stating that a license application "is expected to be ready" does not sufficiently justify use of the TLP over the ILP.
2. **Resource Complexity:** Stating "In the opinion of Goat Lake Hydro, the resource issues are not complex because the environment is fairly well known..." fails to acknowledge the years of documentation and expert advice put forth by ADFG, other agencies and Native peoples that demonstrate the hazards of hydro upstream of the Chilkoot. The issue of resource complexity is addressed by written and spoken comments by proponents of the ILP.
3. **Level of project controversy:** Characterizing articulate spokespersons of state agencies, local environmental organizations, Native Elders and other respected knowledgeable residents of the Haines Borough as a "vocal minority" demonstrates that in fact the level of controversy is such that an attempt is being made to trivialize a portion of the citizenry. The ILP is necessary in order to reduce controversy by ensuring full oversight by a more objective third party (FERC).
4. **Relative Cost:** The greater cost of the ILP will be well worth a result that prevents losses in a multi-million dollar fisheries industry crucial to the economic health of the Haines Borough.
5. **Extent of available information and potential for disputes over studies:** Considerable information exists and continues to come to light. The issue has been in dispute for enough years to prove the "potential for disputes" has been reached and exceeded.
6. **Other Factors believed to be pertinent:** No other factors were put forth by the applicant.

Skagway's vote in favor of the TLP and individual Council Member's comments reflect their lack of understanding of what is at stake for the Haines economy should our Chilkoot fisheries be jeopardized.

Respectfully submitted,

Carol Tuynman  
7 Mile Mud Bay Road  
Haines, Alaska 99827  
907-766-3715  
[ctuynman@gmail.com](mailto:ctuynman@gmail.com)

## Jamie Heinz

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**From:** kate palmer [katepalmer@yahoo.com]  
**Sent:** Monday, July 09, 2012 10:25 AM  
**To:** Daymond Hoffman; joanne waterman; Stephanie Scott; norm smith; steve.vick@alaska.com  
jerry lapp; debra schnabel; Julie Cozzi  
**Cc:** katepalmer@yahoo.com  
**Subject:** Connelly Lake Hydro/ILP

Dear Mayor Scott and Haines Borough Assembly members,

I am writing to ask that you support FERC's (Federal Energy Regulatory Commission) Integrated Licensing Process (ILP) for the proposed Connelly Lake hydroelectric project. The ILP is FERC's default process and is recommended when there are complex resource issues, a high level of controversy, or potential for significant disputes over studies with regard to the proposed project. Most

importantly, the ILP: requires FERC's involvement with a project at the very beginning, provides the public more opportunity for involvement, allows agencies to require that particular studies be done, spells out clear timelines for each step of a project, and provides a conflict resolution process.

The less stringent Traditional Licensing Process (TLP) which APT is petitioning FERC to use, does not provide the above benefits. Given the invaluable fishery resources of the Chilkoot, the cultural values and traditional uses of the valley, the location of the proposed project in the Alaska Chilkat Eagle Preserve, etc., the resource issues are very complex. As was evidenced at the public meeting in Haines on June 27 and the meeting in Juneau on June 26, this is already a very controversial proposal.

The more comprehensive

ILP process is needed to ensure the proposal is fully scrutinized and the interests of all interested parties and the resources are protected.

Sincerely,

Katey Palmer

P.001  
PAGE 01

Fax to: Haines Borough Assembly  
766-2716  
re: Connelly Lake Project

Please endorse a more thorough  
study of the impacts to the

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Chilkot Watershed by passing a  
motion recommending that F.E.R.C.  
utilize the I.L.P. for Connelly  
Lake. The ILP is appropriate  
for this complex and con-  
troversial project

Thank you,

Laurie Daddourian

19077663335  
LAURIE DADDOURIAN

09:15

07/10/2012  
19077663335

RX Date/Time  
07/10/2012 09:14

## Jamie Heinz

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**From:** Stephanie Scott [sscott@aptalaska.net]  
**Sent:** Monday, July 09, 2012 2:41 PM  
**To:** Jamie Heinz  
**Subject:** Fwd: Connelly Lake Comment

A Connelly Lake comment sent to all members of the Assembly plus mayor today.

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Begin forwarded message:

**From:** Melissa Aronson <aronson@aptalaska.net>  
**Date:** July 9, 2012 10:23:57 AM AKDT  
**To:** Daymond Hoffman <[REDACTED]>, Norm Smith <[REDACTED]>, Debra Schnabel <[REDACTED]>, Stephanie Scott <[REDACTED]>, Steve Vick <[REDACTED]>, Jerry Lapp <[REDACTED]>  
**Cc:** Melissa Aronson <aronson@aptalaska.net>  
**Subject:** Connelly Lake

Regarding the Connelly Lake proposed project:

I hope the Assembly will take the most cautious approach to the licensing proposal by APT for the proposed Connelly Lake project which is the Integrated Licensing Process.

I served on the Peak Oil Task Force and chaired the Energy and Sustainability Commission. During that time there were many discussions of the proposed project and it became quite clear that there are many very serious issues that need to be resolved about safety and fisheries. I was disappointed throughout my tenure with the Task Force and Commission that APT didn't take a much more serious role in promoting energy conservation, the "low-hanging fruit" of a sustainable energy plan. There is so much that can be done to promote energy conservation, increase the use of LED lights, encourage net metering, encourage renewable energy sources development, etc. Very little has been done in those areas beyond some individual efforts. We need leadership from the Borough and businesses to promote energy conservation and renewable energy.

The straw man issue of the undersea cable is shadow and mirrors. Connelly Lake would require a cable to Skagway anyway. If APT is so concerned about the existing cable, then they should replace it now or at least have a quick plan in place.

The price of power, if Connelly is built, seems totally unclear. Just how much are the citizens of Haines going to be asked to subsidize the corporate profits of the Seattle based APT?

However it works out, the decision about Connelly Lake needs the absolute most careful consideration. This is absolutely not the time to rush a decision.

Thank you for all of your work on behalf of the current and future citizens of Haines. Let us hope that the future thanks all of us for our work and doesn't blame us for huge mistakes.