

Table 15.4-1. Summary of consultation on Socioeconomic and Transportation Resources study plans.

Comment Format	Comment Date	Licensing Participant Name	Licensing Participant Affiliation	Comment	Response
<u>General</u>					
Memo	8/7/2012		National Park Service	Metrics, analyses regarding socioeconomic costs and benefits of the Susitna-Watana Hydroelectric Project should extend beyond estimated value of increased recreation and tourism. Full accounting of all Susitna-Watana Hydroelectric Project-related impacts on the social environment must include an estimate of these values.	<p>The socioeconomic studies are designed to account for a broad range of social and economic costs and benefits. In addition to the regional economic model analysis, social costs and benefits will be addressed. The assessment will be quantitative when possible but some social issues will need to be addressed qualitatively.</p> <p>Where the dollar cost of measures can be reasonably ascertained, we will do so. However, for non-power resources such as aquatic habitat, fish and wildlife, recreation, and cultural and aesthetic values, to name just a few, the public interest cannot be evaluated adequately only by dollars and cents.</p>

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Memo	8/7/2012		National Park Service	With respect to Benefits Transfer methodology, this method is most reliable when reference, study sites, projects are very similar, and when the economic impact valuation study at reference site was performed at the highest standard. Given the dearth of large, original hydropower projects licensed on free-flowing rivers in remote locations in recent decades, NPS believes it will be challenging to ID appropriate reference project for Susitna-Watana Hydroelectric Project. There will be numerous assumptions, approximations associated w/ application of the benefits transfer method to the Susitna-Watana Hydroelectric Project. In contrast to lack of appropriate reference sites for benefits transfer analysis, however, the value of ecosystem services – including services associated with the Susitna River – is currently being studied in the Mat-Su Borough.	As described in Section 15.6.4.1 of the draft RSP, the benefits transfer approach will be used to supplement or compare unit values (e.g., value per-day of sport fishing) for recreational goods and services obtained from primary valuation methods. It will not be used as the sole method of estimating the value of changes in recreation activity in the Project area.
Memo	8/7/2012		National Park Service	NPS would like to participate in reviewing proposed survey methodology, ideally before ability to comment on the ILP study plans expires.	Meetings on the survey methodology were held on 9/20/2012 and 10/03/2012. Additional information on the proposed survey methodology is included in the draft RSP, in the Appendix of the Regional Economic Evaluation Study Plan and the Appendix to the Social Conditions and Public Goods and Services Study Plan.

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Letter	8/1/2012	John (Jack) DiMarchi		Significant number of private landowners (approx. 200) congregated along AK Railroad corridor between Gold Creek and Hurricane, AK. FERC appears to recognize community of people who own land along railroad to south of Gold Creek (exp: Chase community), but does not appreciate large number of landowners north of Gold Creek; likely b/c we are not formally organized like Chase community is.	Social and economic effects on residents in the study area will be addressed in the Social Conditions and Public Goods and Services study. Section 15.6.3 of the RSP has been revised so that a “railroad community” located north of Chase is among the communities considered to be in relatively close proximity to the proposed Project road and transmission line alternatives. The other communities are Cantwell, Trapper Creek, Chase, and Talkeetna.
Letter	8/1/2012	John (Jack) DiMarchi		Under Environmental Justice language in NEPA, we should be recognized as a community; as lead permitting agency, FERC should open direct dialogue w/ this community to insure: 1 – Accurate info is delivered directly to community members; 2 – Public meetings are held at locations that facilitate community members to participate in NEPA process; 3 – Community’s points of views (for or against Susitna-Watana Hydroelectric Project components) be given weight during development of project alternatives portion of EIS process.	The socioeconomic study will address populations and incomes and may identify whether there are any minority or low-income populations as defined under Executive Order 12898 on Environmental Justice. AEA’s goal during these licensing studies is to provide accurate information to all interested parties, to hold meetings and provide opportunities at a variety of locations to facilitate public participation in the process from all interested parties.

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<u>Regional Economic Evaluation Study (Section 15.5)</u>					
Memo	8/7/2012		National Park Service	Page 263 – Indicates that PSP for Socioeconomics relies largely on results generated through Recreation and Aesthetics Resources studies. Having not seen survey instruments, protocol, NPS does not know how socioeconomic data will be gleaned from those surveys.	Study teams met with NPS and others on 9/20/2012 and 10/03/2012 to discuss survey instruments and protocols. Additional information on the proposed survey methodology is included in the revised study plan in Section 15.5.4 and the Appendix to the Regional Economic Evaluation Study Plan and in Section 15.6.4 and the Appendix to the Social Conditions and Public Goods and Services Study Plan, as well as in the Recreation Study Plan (Section 12).
Work Group Meeting	08/08/2012		Variety of Agencies, Tribal Entities, and Interested Individuals	Review of study plans submitted in July 2012. 1) NPS and other requested more information on the type of people to be interviewed for the socioeconomic studies and the type of questions to be asked. 2) NPS and others requested draft study instruments for review.	1) Information on the type of people/groups to be interviewed and typical questions to be asked have been incorporated into the Appendix of the Regional Economic Evaluation Study Plan. 2) Draft survey instruments are still in development. Example survey instruments are included in the Appendix to the Regional Economic Evaluation Study Plan.

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<u>Social Conditions and Public Goods and Services Study (Section 15.6)</u>					
Work Group Meeting	08/08/2012		Variety of Agencies, Tribal Entities, and Interested Individuals	Review of study plans submitted in July 2012. 1) NPS and other requested more information on the type of people to be interviewed for the socioeconomic studies and the type of questions to be asked. 2) NPS and others requested draft study instruments for review.	1) Information on the type of people/groups to be interviewed and typical questions to be asked have been incorporated into the Appendix of the Regional Economic Evaluation Study Plan. 2) Draft survey instruments are still in development. Example survey instruments are included in the Appendix of the Social Conditions and Public Goods and Services Study Plan.
Survey Meeting	9/20/2012	Cassie Thomas	NPS	It is important to include different planning scenarios and future management regimes.	It is anticipated that the With Project and the Without Project alternatives will have different scenarios and likely different management regimes for at least some resources. Interviews will be held with agency and other personnel to develop the appropriate scenarios and potential management regimes.

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Transportation Resources Study (Section 15.7)					
Letter	8/1/2012	John (Jack) DiMarchi		DOT transportation access study: South Road and Hurricane alternatives – Landowners along railroad corridor, particularly between Gold Creek and Hurricane, stand to be disproportionately affected by 2 access roads under consideration. Although these landowners are not formally organized, they do represent a “community” that may be affected disproportionately (especially by proposed access roads from Hurricane and/or Gold Creek), compared to population at-large.	<p>There are three access road corridors under consideration but at this point AEA is only proposing that one access road be developed. It is our plan to evaluate effects on residents and land owners in the areas that could be directly or indirectly affected by development of a Project access road.</p> <p>The methodology for the Transportation Resources Study (Section 15.7.4.3) acknowledges that we will need to interview stakeholder organizations and knowledgeable individuals about current transportation use as part of the data collection process. This will facilitate the evaluation of potential impacts of the Project on existing transportation resources and uses.</p>
Work Group Meeting	08/08/2012		Variety of Agencies, Alaska Native Entities, and Interested Individuals	Review of study plans submitted in July 2012. NPS emphasized the need to get information on the use of the river as a transportation corridor.	The Transportation Resources Study Plan (Section 15.7.4.3) addresses how information on river use for transportation will be obtained. Existing published information by various land management agencies, access information gathered as part of other survey efforts (such as Recreation and Subsistence), and interviews with knowledgeable people as discussed above – will all be used to document river use for transportation.

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Survey Meeting	9/20/2012	Becky Long	Coalition for Susitna Dam Alternatives	How will you get information on river transportation uses?	The Transportation Resources Study Plan (Section 15.7.4.3) addresses how information on river use for transportation will be obtained as discussed above.
Health Impact Assessment Study (Section 15.8)					
Work Group Meeting	08/08/2012		Variety of Agencies, Tribal Entities, and Interested Individuals	Review of study plans submitted in July 2012. Chickaloon Tribe asked if HIA would be a Rapid HIA or a Comprehensive HIA (CHIA) and how information on subsistence use would be gathered.	The HIA Study Plan (Section 15.8.1.1) clarifies that the HIA will be comprehensive and addresses how information will be gathered.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	Stress importance of engaging community as early as possible, and keeping CHIA process as transparent as possible, throughout the process. Includes engaging community to contribute to, guide potential impact analysis, data gaps, developing and proposing mitigation strategies.	The HIA study (see Section 15.8.3) will rely on community input and best practices for HIA to develop a set of clear criteria which will help identify potentially affected communities (PACs) in a systematic way and facilitate the development of zones of impact for the Project. Local communities may provide additional criteria for consideration through written comments or consultation.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	Area regarding Tribal engagement process to allow for provision and recognition of traditional knowledge as complementary to existing baseline health and other scientific info, needs to be strengthened. Tribal people hold history, knowledge of area; must be some mechanism made for acknowledging how this info will contribute to legitimacy of HIA Study Plan and data collection. Will ultimately strengthen this CHIA.	The HECs are fully described in the “Technical Guidance for HIA in AK”, but there may be community level health concerns that are expressed holistically and do not fit this analytic structure. Section 15.8.4. 1 outlines how the study will coordinate with other social sciences study areas including the Traditional Knowledge interviews being done under the Subsistence study.

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Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.1.1. Study Goals & Objectives – Recommend revising “The goals and objectives of the HIA include the following” section to add engagement piece. Add bullet point reading: “Engage the community in a transparent process of identifying community health concerns for evaluation.”	The HIA study plan, in Section 15.8.1.1 of the draft RSP, acknowledges that through scoping meetings and community engagement planning, AEA will seek to identify public issues and concerns about how community health might be affected during construction and operation of the Project.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.1.1. Study Goals & Objectives – In recognition of federally recognized Tribal governments in potentially affected areas, revise bullet point #2 to read: “Collect baseline health data at the state, borough or census area, tribal, and potentially affected community, as possible.”	Section 15.8.1.1 of the draft RSP has been revised to read: “Collect baseline health data at the state level, borough or census area level, tribal level, and at the level of the potentially affected community.”
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.1.1. Study Goals & Objectives – Question bullet point #3. Once data gaps are IDed, how will this trigger additional studies? Or, will there be weighting of data gaps to determine which are priorities for further review? Can this be addressed in this section?	Section 15.8.1.1 of the draft RSP has been updated to describe how AEA will attempt to identify gaps and determine the most efficient method to fill those gaps, through community consultation and coordination with other field studies such as subsistence, social and demographic studies.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.1.1. Study Goals & Objectives – Revise bullet point #4 to read: “Evaluate the baseline data against the Project description to determine the magnitude of potential impacts, both positive and negative.”	Section 15.8.1.1 of the draft RSP explains that the HIA will use methods and guidelines in the Alaska Department of Health and Human Services (DHSS) “Technical Guidance for HIA in Alaska” July 2011.

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Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.1.1. Study Goals & Objectives – Strongly believe a projective component for potential impacts and applied mitigation strategies should be attempted in CHIA.	As noted in Section 15.8.4.3 of the draft RSP, the information developed in this study may be used to prepare a Health Management Plan (HMP) which may include: Traditional Knowledge, perspectives, and activities that may represent uniquely tribal approaches to human wellness.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.2. Existing Info & Need for Add'l. Info – Feel strongly that traditional knowledge should be gathered through qualitative discussions within Tribal communities to contribute to completion of HIA. Info should be given same weighting as other scientific info gathered.	Section 15.8.3 of the draft RSP has been updated to describe that the study will rely on community input and best practices for HIA to develop a set of clear criteria which will help identify PACs in a systematic way and facilitate the development of zones of impact for the project.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.2. Existing Info & Need for Add'l. Info – Data gaps should not just be noted, but should attempt to be adequately addressed in further studies to be determined by community.	Section 15.8.1.1 of the draft RSP describes how we will identify gaps and determine the most efficient method to fill those gaps, through community consultation and coordination with other field studies such as subsistence, social and demographic studies.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.3. Study Area – Tribal communities should have opportunities to: weigh-in on impact areas; in defining study area; in defining key subsistence resources rather than simply relying on ADF&G or USFWS as only viable source of info for CHIA.	Section 15.8.3 of the draft RSP has been updated to describe that local communities may provide additional criteria or considerations through written comments or consultations.

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Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.1. – Community should have opportunity to ID the “Issues Summary.”	Section 15.8.4 of the draft RSP has been updated to confirm that AEA intends to coordinate through community engagement other social study areas, and through AEA licensing participant engagement programs to ensure there will be enough information to meet Health Impact Assessment needs.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.1. – Comprehensive discussion pertaining to Social Determinants of Health (SDH) should occur to ID disparities affecting various community groups, and potential to project future impacts, both positive and negative.	Section 15.8.4.3 of the draft RSP outlines how AEA will undertake detailed consideration of impacts to Alaska Natives through the presentation of tribal health data and inclusion of the results of tribal health consultations in the HIA.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.1. – Many local indigenous cultures pass down info orally. Traditional knowledge regarding past, present concerns related to similar development projects should be acknowledged as valid in addressing “Casual links between the proposed project and the anticipated health impacts.” There must be consideration in CHIA for undocumented, yet authentic experiences conveyed orally.	Section 15.8.4.3 of the RSP outlines how AEA will undertake detailed consideration of impacts to Alaska Natives through the presentation of tribal health data and inclusion of the results of tribal health consultations in the HIA. The Traditional Knowledge interviews in the Subsistence studies will also likely help AEA identify more information that could be of use in the HIA.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.2. Phase 2: Baseline Data Collection – Clearer definition for study of subsistence issues and “reasonably close proximity” needed. Project will likely impact salmon and displace moose habitat significantly; therefore, definition will need to be discussed w/ scientific experts, local Tribal experts.	Section 15.8.4.2 of the draft RSP notes that the HIA Team will coordinate with communities and the subsistence study team to address how subsistence issues interact with the proposed project locations, size, linear features, and potentially affected communities.

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Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.3. Phase 3: Impact Assessment – Suggest adding / revising following bullet point to include “An in-depth review of available state, regional, tribal, and local health data.”	Section 15.8.4.3 of the draft RSP has been updated to include accommodation for an in-depth review of available state, regional, tribal, and local health data.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.3. Phase 3: Impact Assessment – Suggest special emphasis be performed for impacts to tribal peoples; especially in relation to social determinants of health and subsistence impacts.	Section 15.8.4.3 of the draft RSP describes how AEA will access information from existing State disease-control programs and strategies to address information regarding background and conditions regarding social determinants (e.g. HIV/AIDS, hypertension, diabetes, substance abuse, etc.).
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.4.3. Phase 3: Impact Assessment – Holistic approach to looking at health will help w/ development of more effective Health Mgmt. Plan; however, if CHIA finds no place for Traditional Knowledge, a HMP could be one more document which compartmentalizes health in a way that is not helpful or applicable to local Tribal peoples.	The Traditional Knowledge interviews and studies outlined in the Subsistence Study Plan (Section 14.5) describe how Traditional Knowledge information will be gathered and analyzed. Section 15.8.4.3 of the draft RSP describes how Traditional Knowledge, perspectives, and activities that may represent uniquely tribal approaches to human wellness will be assessed.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.5. Consistency w/ Generally Accepted Scientific Practices – Stress importance of traditional knowledge, and how CHIA should make a place for this type of evidence-based knowledge.	Section 15.8.4.3 of the RSP describes how traditional knowledge (gathered both in HIA and Subsistence studies), provides information and perspectives that may represent uniquely tribal approaches to human wellness.

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Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	13.8.6. Schedule – Not enough time allocated on front end to help w/ development of Project Overview and Issues Summary. Section is integral to getting community buy-in on the CHIA. If work is not done on the front end, it will not have credibility on the back end. Not enough to do this during Baseline Data Collection process. CHIA calls for more of a community-based participatory research approach. The community, whenever possible, should be included to have ownership over contributing to the document.	Section 15.8.4.2 of the RSP has been updated to describe that in addition to community engagement discussions, the HIA team will visit relevant communities during the field studies phase of the baseline data collection to document community food sources and make observations on critical community services, such as water, sanitation, and health care facilities.
Letter	9/14/2012	Lisa Wade, Director	Chickaloon Village Health & Social Services	This only constitutes commentary on sections 13.8. Have made several recommendations that will strengthen CHIA process. Have similar concerns pertaining to other parts of Section 13. Would like additional time to review these sections, as they all have direct impact on Tribal citizens.	Comments noted and AEA expects to continue to engage Chickaloon Village and other interested parties during the final study plan process and during implementation of studies and eventual development of AEA's license application for the Susitna-Watana Hydroelectric Project.
<u>Air Quality Study (Section 15.9)</u>					
				(No comments to date)	