Feb. 11, 2015

Sandra Stevens
Tongass National Forest, Petersburg RD
Petersburg, AK 99833

Dear Ms. Stevens,
Please accept my comments regarding the Kake to Petersburg Transmission Line Intertie Project DEIS. Though I do not oppose the idea of an intertie in concept, the project as described has a number of key flaws that make it a very expensive project that is unlikely to meet its stated goal of providing lower cost power options for the community of Kake. The Purpose and Need portion of the project Summary states "The proposed project would connect Kake to SEAPA'S interconnected network and provide access to relatively low cost electricity". (This statement is actually contradicted on page 3-251 of the DEIS). For this reason, I advocate the No Action alternative.

I also take issue with the oft-repeated claim that this and the Kake Petersburg Road are not intimately connected projects. The two projects have been discussed in concert in everything from the narrative to the State budget that appropriated $40 to study the road project, to this document. Every public meeting, website and document discusses both projects and the value of the road to this project. Furthermore, the narrative to the State budget that identified the road appropriation specifically outlined the thought process used to choose a lead agency for the road project in order to reduce the risk of litigation--it comes right out and says this. This implies the projects were also broken out to be able to secure federal funding through the MAP-21 legislation, which probably would not have applied had the projects been considered together.

The Issues section p1-15 completely misses that economics/socioeconomics is <u>the</u> key issue of this project and is the driver of the project. If the cost of power to Kake was not a concern, this project would not be proposed. It also completely misses Subsistence as an issue, though later in the document the value of subsistence activities to Kake's population is identified. In a teleconference between Kake and Petersburg on the road project held more than a year ago, Kake representatives expressed concern that a road would open up traditional subsistence hunting areas to residents of other areas. See Chapter 3, p 3-7.

In Chapter 2, it should be noted that the Petersburg Borough has been working toward restricting or eliminating the use of herbicides for clearing rights-of-way, and this could affect projected maintenance costs.

In Chapter 2, p. 2-31 the document discusses a "year round" road. Virtually no rational person considers that any road built would be an all-round road. It is cost-prohibitive, dangerous and logistically too difficult to maintain access year round. When Andy Hughes of DOT spoke publicly before the Petersburg Assembly over a year ago and was specifically asked about maintenance dollars for this project in the face of declining State and Federal dollars, he readily admitted that it was unlikely that this road would be of high enough priority statewide to get the funding needed to keep it as an all season road. The archive of that conversation is found on the Petersburg Borough website.

This needs to be corrected throughout the document. It simply is not true that any road associated with the Intertie or the K-P road would be an all-season road. Saying it is so doesn't make it so.

SEAPA has said they won't fund this project, and the DEIS says they intend to fund the project through grants. What type of grants, and the likelihood of receiving those grants is not discussed, but in this fiscal climate that doesn't seem like a given. More information needs to be presented about this, as it speaks to the financial feasibility of this project.

It is extremely unclear how this project will actually benefit Kake. There is, at present, not an excess of power to be able to sell to Kake. Petersburg, Wrangell and Ketchikan are part of their own power sales agreement, to which Kake is not a party. This new project and its associated maintenance costs would potentially be borne entirely by Kake, which would not result in lower power costs.

In Chapter 3, there is discussion of the state's survey as being statistically valid. My home received a survey call, but I objected to the framing of the questions as being leading. All were premised in a way that would imply the respondent thought the projects were reasonable, including shuttle ferries to the mythical "all season road" that supposedly isn't a part of this project. The same road that would, coincidentally, result in lower maintenance costs to SEAPA if built. It is no wonder the public is confused about what is and is not a part of each project, and is another reason why these projects need to be analyzed together. The road project document is projected for one year out, and there isn't currently funding for this project despite the ambitious time schedule. In reality, the two projects are potentially on a much closer time schedule than the document(s) imply.

On page 3-252 the document states that if the KPI project is built, IPEC could structure costs for commercial entities that would provide economic incentives, while managing to recover construction costs through normal rates. Suggesting that this could help lower rates and attract new investment to Kake is fairly speculative.

On page 3-351 the discussion for the action alternatives states the cost per kWh would not necessarily result in a reduction in residential power rates, though this is a goal of the project (as well as lower commercial rates). If the desire is only to lower commercial rates, that needs to be stated more clearly up front.

The annual savings for the transmission line is probable but speculative. It is also concerning that the project is not projected to produce more local employment.

Thank you for the opportunity to comment.

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