



VIA EMAIL ONLY

(comments.scro.leasing@alaska.gov)

July 8, 2024

State of Alaska, Department of Natural Resources
Division of Mining, Land & Water
550 W. 7th Ave., Suite 900C
Anchorage, AK 99501-3577

RE: Little Mount Susitna Wind, LLC, Preliminary Decision (ADL 233892, ADL 234252, ADL 234276)

To the Southcentral Regional Land Office:

Cook Inletkeeper (Inletkeeper) is a public interest organization formed in 1995 to protect the Cook Inlet watershed and the life it sustains. Below find comments on the above-referenced matter on behalf of Inletkeeper and its more than 8,500 members and supporters in southcentral Alaska.

We support the preliminary decision to lease public land to Little Mount Susitna Wind. This project would bring renewable energy capacity to our grid, which is urgently needed. The windfarm's main waste product is expected to be used lubricant oil, meaning the project will produce energy for the people of the Cook Inlet watershed without creating a long-term pollution source or major spill risk. If thoughtfully planned and executed, the project's impacts on wildlife and habitat can be mitigated to an acceptable level, and construction impacts mitigated by careful timing and best practices. We expect the future permitting process to set these conditions.

We expect that future permitting will include analysis of the hydrological impact of road construction, consistent with the management intent of the Susitna Matanuska Area Plan, Susitna Flats State Game Refuge, and appropriate protection of the Theodore and Lewis river salmon runs. The access roads can be consistent with intact and healthy salmon habitat if best management practices are implemented to ensure groundwater connectivity, proper drainage for flood flows, silt controls, fish compatible culverts, adequate vegetative buffers, and if construction is timed outside salmon migration and incubation periods.

On a global scale, the potential of windfarms to displace birds living in or using nearby habitat is variable. A 2021 review of studies on the effects of windfarms on bird populations found that displacement was observed in 40.6% of the studies – while half the studies found no effect and 7.7% found attraction effects (<https://www.mdpi.com/2673-6004/2/4/34>). Research and monitoring will be needed to determine the effects of this specific windfarm on the specific populations of birds using the area, and future permitting should also make this a condition of

approval. Precautionary measures such as painting a turbine blade black and reducing turbine speeds during sensitive times, as recommended by the Alaska Department of Fish and Game, may be appropriate. Painting one turbine blade black to enhance visibility was shown to reduce bird fatalities by 70% at one windfarm in Norway (<https://onlinelibrary.wiley.com/doi/10.1002/ece3.6592>).

In light of the Cook Inlet region's urgent need to decrease reliance on Cook Inlet natural gas, and the world's need to move away from carbon-emitting energy sources, we support the approval and construction of the Little Mount Susitna Wind project, once the appropriately strict environmental conditions have been approved and met.

Thank for your consideration,

A handwritten signature in black ink, appearing to read 'Loren Barrett', with a long horizontal stroke extending to the right.

Loren Barrett, Co-Executive Director