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FAX COVER SHEET

TO:

My Clerk / Tom Lyons No. of Pages 3

FAX NUMBER 762-4448

FROM:

GEOFFREY Y. PARKER

DATE:

9-9-02

RE:

Congress

NOTICE

The information contained herein is confidential and may be urgent. If you have received this by mistake please call the Law Office of Geoffrey Y. Parker immediately at (907) 222-6859. If you have not received all the pages, please call immediately. Thank you.

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CHUGACH ELECTRIC
CLPP Relicensing Project

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CHUGACH ELECTRIC
CLPP Relicensing Project

September 9, 2002

Thomas A. Lovas
Manager, System Development and Corporate Planning
Chugach Electric Association, Inc.
5601 Minnesota Drive
P.O. Box 196300
Anchorage, Alaska 99515-6300

Re: Cooper Lake Hydroelectric Project (FERC No. 2170); Recommendations in response to Initial Consultation Package and Formal Requests for Studies

Dear Mr. Lovas:

I have reviewed the "Initial Consultation Package" of June 2002 and the "Preliminary Study Concepts and 2002 Data Collection Method for Relicensing of the Cooper Lake Project (FERC No. 2170)" dated August 13, 2002. I am submitting these comments on behalf of the Alaska State Council of Trout Unlimited and the Alaska Fly Fishers.

FERC regulations require that the initial consultation package include a study plan. I do not see this in the package. I believe that this insufficiency was brought to the attention of Chugach by state and federal agencies and resulted in the "Study Concepts" document. When I popped up the "Study Plans" on the website, none are listed; I get an empty page. It appears to me that there is no draft study plan.

Recommendations: We incorporate by reference ADF&G's request for instream flow essential for fish passage, but add that it should also provide sufficient dilution of the coldwater inflow of Stetson Creek so as to render the water below Stetson habitable for fish.

Recommended Studies:

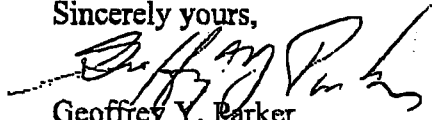
I looked at ADF&G's and USFS's recommended studies concerning natural resources, chiefly fish, wildlife and water, and concur. I would add these concerning economics and power:

1. How necessary is the power from the facility, and what options exist to replace the power, either fully or in part, if the facility were not relicensed, or if the generating facility were moved, or if some other requirement was established to restore water, fish and wildlife, and recreational values in Cooper Creek.
2. What are the economics of the existing facility and what would they be if various options were pursued if full, substantial or partial restoration of the Creek were required.
3. Natural Resource Economics: We suggest hiring a natural resource economist to use contingent valuation, or some comparable methodology, to examine and compare the economic values held by, or benefits conferred upon, consumers of the power to the

Mr. Lovas
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intrinsic values and use values held by the public at large and that would be afforded by complete and partial restoration of Cooper Creek.

Sincerely yours,


Geoffrey Y. Parker