



January 29, 2021

Samantha Owen
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via: owen@mcmjac.com

RE: Comments on the Revised Draft Study Plans for the 1991 Fish & Wildlife Agreement Implementation, Eklutna Hydroelectric Project

Dear Ms. Owen,

Please accept these comments on the Revised Draft Study Plans for the Eklutna Hydroelectric Project on behalf of Trout Unlimited (TU). Trout Unlimited appreciates the opportunity to participate in the Technical Working Group (TWG) in developing these study plans, and looks forward to their completion and implementation.

Trout Unlimited recognizes the significant revisions to the study plans made over the past months and the efforts the utilities have taken thus far. Significantly, TU encourages the utilities to continue and to redouble their efforts to involve the Native Village of Eklutna (NVE). The Eklutna Hydroelectric Project is on the traditional and cultural lands of the Dena'ina people, who were not consulted when the project was built and have not been allowed to be a formal party to the 1991 Agreement despite bearing the brunt of the impact from the project to the Eklutna watershed and its fish and wildlife.

We also encourage the utilities to become bolder in how they approach their obligations under the 1991 Agreement. At various times throughout the quarterly stakeholder meetings or TWG meetings, it too often seems as though the utilities are seeking out obstacles to moving forward instead of seeking out solutions to those obstacles. Trout Unlimited appreciates the complex issues and challenges that must be overcome to mitigate for the impacts of the project and meaningfully restore the Eklutna River watershed, and recognizes the importance of being thoughtful and thorough throughout this process. However, we encourage the utilities to take advantage of the broad support they enjoy for restoring the Eklutna River, and to take immediate action toward overcoming challenges as soon as they are identified. Acting now is especially important where infrastructure limitations may exist, where state or federal permits are required, or where water rights might be concerned. Each of these challenges can be overcome, but doing so can be time consuming and failing to act as soon as they are recognized gives the impression the utilities may be dragging their feet—even if that is not the case.

Trout Unlimited commented previously that the instream flow study was designed around target flow releases that are too far below natural flow levels, and that the model should be calibrated to at least 1,000 cfs. We are disappointed these recommendations have not been incorporated into the study plans. The Comment Response Table indicates “the upper test flow of 150 cfs was selected as a

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conservative estimate of the highest flow that can be provided under existing infrastructure.” While the existing infrastructure is a factor that must be considered when developing the study plans, it should not be the determinative factor. What about the existing infrastructure, specifically, is limiting a model more representative of the actual stream channel and historic flow? What actions have the utilities taken to overcome those limitations? Historic summer flows regularly reached 1,000 cfs and peak flows occasionally exceeded 2,500 cfs. The instream flow study will have limited value if it is not calibrated at a much higher rate.

In addition to the significant comments discussed above, TU has the following short comments:

- 3.1.1 Background: This section mentions that Dolly Varden have become established above Thunderbird Creek. Although salmon are discussed elsewhere, we recommend also mentioning that adult and juvenile salmon have also been observed in some reaches.
- 3.3.1.2 Dolly Varden, Threespine Stickleback, Burbot: We recommend including rainbow trout in the title since they are also discussed and have important social and recreational value.
- 3.7.1.1 Lake Habitat: This section refers to the tributaries into the lake as Eklutna Creek. These tributaries should be referred to as the East Fork Eklutna River and West Fork Eklutna River.
- 3.11.7 Fish Hatchery/Tailrace Assessment: It is unclear whether the utilities are considering using hatchery-reared fish to supplement natural spawning and rearing within the Eklutna watershed itself. While TU supports the Eklutna tailrace fishery and believes successful mitigation efforts will not meaningfully impact the tailrace fishery or hatchery operations, hatchery supplementation within the Eklutna River itself is unnecessary and should be avoided. As we have already seen, salmon are already colonizing above the lower Eklutna dam site. Experience elsewhere demonstrates that hatchery supplementation in restoration efforts is an unnecessary cost and can often frustrate natural spawning and rearing.

Thank you for the opportunity to provide these comments on the Revised Draft Study Plans. Trout Unlimited is excited for the future of the Eklutna River and looks forward to continued collaboration with the utilities and other members of the TWG.

Sincerely,



Austin Williams
Alaska Director of Law and Policy
Trout Unlimited