



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**

*National Marine Fisheries Service*

*P.O. Box 21668*

*Juneau, Alaska 99802-1668*

April 27, 2021

Municipality of Anchorage  
Matanuska Electric Association, Inc.  
Chugach Electric Association, Inc.  
P.O. Box 196300  
Anchorage, Alaska 99519

RE: Concurrence with Eklutna Hydroelectric Project's Proposed Final Study Plan

Dear Ms. Henderson, Mr. Zellers, and Mr. Brodie:

The 1991 Fish and Wildlife Agreement: Snettisham and Eklutna Projects (1991 Agreement) requires the Eklutna Hydroelectric Project owners ("Owners") to develop and a Fish and Wildlife Program to protect, mitigate damages to, and enhance fish and wildlife impacted by the continued operation of the Eklutna Hydroelectric Project ("Project"). The proposed Fish and Wildlife Program will be reviewed by the resource management agencies, including NMFS, the public, and the Governor of Alaska. To facilitate the development of the Fish and Wildlife Program, the Owners are required to fund studies to examine impacts to fish and wildlife from the Project. The Owners are required to develop this Study Plan in consultation with the resource management agencies, including NMFS. Prior to implementation of the Study Plan, NMFS, along with the other parties to the 1991 Agreement, must review and concur with the Plan's scope of work. We have commented on three drafts of the Eklutna Study Plan (11/25/20, 2/4/21, and 3/11/21). The Owners incorporated some of our suggestions.

We agree that the Proposed Final Eklutna Study Plan (Proposed Study Plan), dated February 2021, was developed in coordination with the parties to the 1991 Agreement. We understand that minor changes may occur based on our March 11, 2021 comments, as well as other parties' comments. The Proposed Study Plan describes a set of actions to commence and execute ten studies in 2021, and outlines plans for continuing several of those studies in 2022, as well as the commencement of additional studies in 2022. The actions described in all ten studies proposed for 2021 will increase the general ecological knowledge and inform the proposed Fish and Wildlife Program that will protect, mitigate damages to, and enhance fish and wildlife impacted by the continued operation of the Project. NMFS concurs that the intent and breath of the Proposed Study Plan will provide sufficient information to develop a Fish and Wildlife Program.

We have ongoing interest in how two of the multi-year studies will be executed given that several important details are left for future decisions: 3.2 Geomorphology/Sediment Transport Study and 3.1 Instream Flow Study.

The Geomorphology/Sediment Transport Study will release and monitor three flows during 2021 that will inform how these moderate flows will transport sand, silt, and clay particles down the existing channel. These releases will provide valuable information as the Eklutna River is inundated with these smaller sized particles and similar flows are extremely likely to happen annually. We are also



interested in flows of sufficient size to clean and transport spawning gravels for Chinook, sockeye and coho salmon, as these gravels are critical to having a sustainable population of salmon. The Study Plan proposes to release and monitor a flow with the ability to transport spawning gravels in September of 2022; however, the Study Plan states that, in the absence of liability agreements, the Owners may not release this larger flow. If the Owners do not release and monitor this larger flow during the study plan period, the governor, the agencies, and other stakeholders will not have necessary information to design a Fish and Wildlife Program with the potential to restore sustainable Chinook or sockeye habitat.

The Instream Flow Study tasks planned for 2021 will provide data to model the available fish habitat in the existing Eklutna channel at flows below approximately 400 cfs. While the Eklutna River flowed above 800 cfs from July 1 to August 30 each summer before being damned, we acknowledge that these sustained high flows are unlikely to be part of the Fish and Wildlife Program as such sustained high flows would not leave sufficient water for energy generation or human consumption.

A large flow is likely to reshape some reaches of the channel in the next decade whether that be in the form of a deliberate flow release in 2022 as proposed in the study plan, or the result of a fall rain-on-snow event that causes the full reservoir to spill. A deliberate release or reservoir spill that reshapes the channel may make the fish habitat information generated by the 2021 Instream Flow Study less accurate for the entire river and obsolete in some short stretches; all parties have acknowledged this possibility. While we prefer the Owners release a large flow prior to initiating the Instream Flow Study, we agree that the Instream Flow Study proposed for 2021 and 2022 will provide valuable information.

Most 2021 studies will report their first-year results to the Technical Work Group (TWG) in the fall of 2021. The Owners will consult with the TWG on what additional work needs to happen in 2022 to complete each study. For several studies, the Proposed Study Plan requires consultation and coordination with the TWG during the spring and summer of 2021. This is needed to finalize which habitat attributes to use in PHABSIMS, where to place survey transects, and which modeling approaches to use among other items. Both the practice of using TWGs to refine study details and adapting the second year of studies based on first year study results are standard practice. It is important that the Owners and their consultant schedule enough meetings with sufficient advanced notice that the TWG has time to provide meaningful input and that the TWG's input can be incorporated into the fieldwork.

We commend the Owners for striving to incorporate all comments into the Proposed Final Study Plan and recognize the value in starting the studies this summer. Please contact Sean Eagan at [sean.eagan@noaa.gov](mailto:sean.eagan@noaa.gov) or by phone at 907-586-7345 if you have any questions.

Sincerely,

  
for James W. Balsiger, Ph.D.  
Administrator, Alaska Region

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