

From: [Mark Spano](#)
To: [Sam Owen](#)
Subject: Comments on Draft Fish and Wildlife Program, Eklutna Hydro Project
Date: Monday, February 12, 2024 12:09:33 PM

I'm submitting the following comments after reviewing the materials on the project website and attending the Anchorage public meeting in January 2024. After the meeting presentation, I spoke with several of the subject matter experts to gauge whether my concerns, outlined below, are well grounded.

My Background: I worked for the Anchorage Water and Wastewater Utility (AWWU) for 30 years. I was the Water Quality Supervisor for most of that time and as such was responsible for monitoring drinking water to ensure that it met federal and state standards. I held a Water Treatment Operator certification during my time at AWWU and am knowledgeable about source water protection and treatment plant operations. I recently served seven years on the Chugach State Park Citizen Advisory Board. I do not represent either organization, but the knowledge gained from working there informs my comments.

I support the proposed plan to introduce water via the AWWU portal one mile downstream from the lake. It makes the most financial sense; it should create a flourishing fishery in the river, and it meets the intent of the 1991 agreement.

However, the reason I wish to comment is not to list the many other reasons why this option is best. It is instead to argue strongly against any option intended to introduce a flourishing fishery into Eklutna Lake by removing or modifying the dam. I have two areas of concern – negative impacts to the drinking water supply and increased adverse human/bear interactions.

Human/bear interactions:

Salmon attract bears. There is a campground next to the lake and a well-used trail adjacent to the lake along its entire length. A flourishing fishery in the lake will attract more people and bears to the lake. This will most certainly cause more bear/human interactions with increased possibility of injury or death to both.

Water Quality Impacts:

Eklutna Lake provides about 90% of AWWU's raw water supply. There isn't any other combination of AWWU's other sources that could replace this source. The first of five primary reasons for the creation of Chugach State Park, as listed in Alaska Statutes (AS 41.21.120-41.21.125), is *"To protect and supply a satisfactory water supply for the use of the people"*.

There is a possibility of negative impacts to water quality through the addition of organic compounds to the water from live and rotting fish. The process at the Eklutna Treatment Plant

is designed to remove inorganics, primarily glacial silt. It isn't designed to remove organic compounds that can combine with chlorine to cause taste and odor issues. It's difficult to gauge whether this is a legitimate concern because no one was able to give me a firm estimate of what the increased biomass to the lake might be from the introduction of a fishery. **But no robust study by a team of professionals (that should include fishery experts, water quality chemists and water treatment engineers) has been done to determine if measurable negative impacts are possible.** AWWU was represented at the meetings that led to the proposed option. But it seems, from review of the project documents and talking to the public meeting subject experts, that only the most cursory consideration of water quality impacts has been done to date and that AWWU has been more focused on impacts to infrastructure.

Even if a valid study shows that the increased biomass shouldn't cause a problem, good management practices for raw water reservoirs (which Eklutna Lake is) would carefully manage public access rather than purposely create additional recreational opportunities that will attract significantly more people to the lakeshore and into the water.

Thanks for the opportunity to comment.

Mark Spano

Anchorage

markspano55@gmail.com