

**From:** [Eric Booton](#)  
**To:** [Sam Owen](#)  
**Subject:** Eklutna Mitigation Public Comment  
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Please accept the following comment on behalf of Eric Booton, CEA ratepayer.

Since its construction, the Eklutna Hydroelectric Project has grossly harmed a wild salmon stream of significant cultural importance. Now, nearly 70 years later, the time has come for project operators to take ownership of its impact. As currently operated, the obstructive project utilizes a diversion dam at the outflow of Eklutna Lake to block all of the water that would otherwise flow down the Eklutna River. Instead, 100% of the water is diverted - 10% of which is utilized to meet 90% of Anchorage's drinking water needs, 90% generates a scant amount of electricity before releasing the water into the neighboring Knik River. With no water flowing out of Eklutna Lake more than 8 miles of the Eklutna River are devoid of flowing water and the passage of adult and juvenile wild salmon into and out of Eklutna Lake is blocked. For nearly a century, salmon have clung to existence by a trickle of water as the health of the wild salmon population has been significantly diminished as a result of project operators' elective use of water.

The Eklutna Hydroelectric Project was sold by the federal government to the operators through a unique act of congress that came with the obligation to make up for the project's impact to fish and wildlife and their habitat. The sale also included a one of a kind arrangement allowing for the project operators to circumnavigate the FERC licensing process and lead their own mitigation process. While project operators and contractors sing their own praises, reality is the mitigation process so far is unworthy of celebration and has been marred with skepticism and concern by several parties and technical experts who contributed to it.

Following the review of the field studies, numerous alternatives were submitted by members of the technical working group that would appropriately balance the use of Eklutna Lake water in a manner that preserves access to drinking water, allows for continued operation of the project and appropriately meets the needs of wild salmon. It is disheartening to see that the project operators have taken advantage of their power under the 1991 agreement with a bullheaded attempt to overlook their project's impact and check the mitigation requirement box by doing as little as possible - which is exactly what we have witnessed with the the preferred alternative they have shared with the public.

The draft mitigation plan presented by the operators of the Eklutna Hydroelectric Project fails to make up for the project's impacts as required by the 1991 agreement and allows the project operators to pass the burden of responsibility to AWWU. The AWWU portal option presented is inadequate and concerning for the following reasons:

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Only 40 cfs will be released in the summer (4% of historic flows) and 27 cfs in the winter. This is far from enough water to provide Eklutna River salmon with reliable access to spawning and rearing habitat, much of which is located in side channels that will be left dry with only 40 cfs of water. Additionally, the public is right to be skeptical that 27 cfs is an adequate winter flow for the survivability of salmon eggs.

- Water will be released into the Eklutna River from the AWWU pipe approximately a mile below the diversion dam at the outflow of Eklutna Lake. As a result, a mile of the Eklutna River will be left dry.
- Without flowing water, wild salmon will still be blocked from migrating to and from Eklutna Lake and accessing the historic habitat in Eklutna Lake and its tributaries.
- Without access to Eklutna Lake, sockeye salmon will not be able to recover.
- The AWWU pipeline provides Anchorage's drinking water, the most important use of Eklutna Lake water. The operators preferred alternative places concerning and unnecessary stress to AWWU's infrastructure and is a risk to the drinking water supply of nearly all of the area residents.
- AWWU infrastructure undergoes routine maintenance in which the flow of water in the pipe is turned off. Regular maintenance of AWWU infrastructure will leave the Eklutna River dry during its duration and wild salmon at all life stages will be harmed.
- The AWWU portal draws water from an intake valve at the bottom of Eklutna Lake where it is significantly colder than the surface water that would flow down the Eklutna River under a normal flow regime. As a result, water from the AWWU portal may very well be too cold for the recovery of salmon. This concern has been made abundantly clear in the case of the botched mitigation of the Cooper Creek project where Chugach Electric Association has spent years attempting to engineer a solution that will pipe water of the appropriate temperature past the Cooper Creek dam and into Cooper Creek.

The Eklutna Hydroelectric Project does not provide flowing water to 8+ miles of the Eklutna River and does not allow fish passage to Eklutna Lake. The preferred alternative of the project owners only satisfies their interests and fails to mitigate any of the impacts that the project they are responsible for created. To this point, it is a devious attempt to escape responsibility and do little more than continue business as usual.

Area residents and the Eklutna people have held hope for a fully functioning and healthy

Eklutna River since the removal of the abandoned lower Eklutna dam in 2018 which removed a major barrier to reviving the fractured river system and mitigation of the Eklutna Hydroelectric Project has been the long anticipated opportunity to further repair the system with flowing water and fish passage. Additionally, the late Representative Young and his successor, Representative Peltola, have expressed their support for Native Village of Eklutna and restoring the river. The Anchorage Assembly has reiterated their support for restoration through numerous bi-partisan actions and the MatSu Fish & Wildlife Commission has also provided letters to the project operators reiterating the need for adequate flow and fish passage.

Though the mitigation process began in 2019, the public wasn't officially invited into the mitigation process until late 2023 when the draft fish and wildlife plan was released for review and comment. In January 2024, public meetings were hosted in Palmer, Anchorage and Eagle River. For 5 years many members of the public have been waiting for their opportunity to formally support restoring the Eklutna River by sharing their comment with the utility owners at the public meetings, the primary public engagement moment in the mitigation process. Without discussion or opportunity for public comment, I was vehemently dismayed when the "public meeting" was little more than a public relations presentation that the public was asked to attend. It is clear that the public meetings were engineered to minimize public involvement and promote the biased preferred alternative of the project owners as if it is the public's only option.

It is important to remember that the draft fish and wildlife plan is indeed a draft, and as written, it cannot be accepted by the public and ratepayers, and should not be accepted by Governor Dunleavy or the Parties to the 1991 Agreement. The AWWU portal put forth by the project operators still bears a \$57 million price tag - that's \$57 million that will be wasted on a mitigation plan that will leave the river fractured and fail to lead to a salmon fishery of any abundance. Yes, a mitigation plan that will meet the needs of wild salmon will come with additional costs, but those initial costs will come with significantly increased reward for Alaskans and the Eklutna people. This is why several groups, including Native Village of Eklutna, Eklutna Inc, The Conservation Fund and more, are on the record having committed to raise the funding necessary for engineering alterations to assist the utilities in enacting a mitigation plan that is likely to actually recover wild salmon.

To make up for the project's impact to fish and wildlife and their habitat, in honesty, it is critical that the final fish and wildlife plan include adequate flowing water the entire length of the Eklutna River and fish passage to Eklutna Lake for adult and juvenile fish. The AWWU portal is not a viable option and should no longer be pursued. Numerous alternatives were provided by members of the technical working group that would make an appropriate alternative to the AWWU portal and should be reconsidered, though removing the diversion dam is likely the best alternative to preserve drinking water, meet the needs of fish, and still

allow the Eklutna Hydropower Project to operate. Being that the mitigation process has been poorly conducted and stakeholders are far from agreement with the project operators, extending the process to avoid rushing to make a decision of severe consequence is a very reasonable request.

We built these dams and they have cost us, and the Eklutna people, more than we will ever fully know. Modernizing the operation of the Eklutna Hydroelectric Project to operate with a minimal impact to natural resources is both honorable and very achievable and any loss in power generation can be easily recovered with more renewables. Wild salmon are slipping throughout Alaska and, in the case of the Eklutna River, we do not have to accept a struggling salmon fishery, and it's not a future the Eklutna people should be asked to accept.