

From: [Chantal de Alcuaz](#)
To: [Sam Owen](#)
Subject: Comment on Eklutna Hydroelectric Project
Date: Monday, February 19, 2024 6:36:52 PM

The Alaska Center
808 E St, Suite 100
Anchorage, AK 99501

To the Owners of the Eklutna Hydroelectric Project:

The Alaska Center is a 501(c)4 advocacy nonprofit organization, with over 50 years of history, based in Anchorage. We have tracked this mitigation process since 2019, in coalition with partners, including the Native Village of Eklutna and Trout Unlimited.

Our organizational vision is a thriving, just, and sustainable Alaska for future generations. In our view, the proposed Draft Fish and Wildlife Program is antithetical to that vision; it is unjust, unsustainable, and will fail to enhance the Eklutna River as is required by the 1991 Fish and Wildlife Agreement.

The Draft Program fails to acknowledge the needs of salmon; the proposed flows of 27 cfs in the winter and 40 in the summer are inadequate to bring back populations at even a fraction of what once existed. It is difficult to believe that a mere 3% of historic flows would be considered “mitigation and enhancement.” This proposition is even more difficult to believe when compared to flows proposed by US Fish and Wildlife Service and National Marine Fisheries Service of 75 cfs in the winter and 160 in the summer. The fish deserve better, and an entire ecosystem that was once dependent on the vital nutrients provided by this keystone species deserves better. This proposition fails to rectify the harm done to the land for the last 100 years.

In addition to the flaws in the proposal itself, we have significant concerns about the process. As an advocacy organization, we care deeply about the ability of the public to comment on and be involved in decisions that directly affect us. One would hope that this mitigation process, which will lead to impacts on municipality taxes and utility rates, would encourage robust public participation. To be frank, we were shocked to learn that at the meetings, hosted by the owners group, the public comment would not be received in an open forum as is usually the case in such proceedings. It was only more disheartening to learn that the public felt so disregarded, that only 17 out of 230 attendees left comments.

Later in the process, we were heartbroken to learn that the utility companies signed a binding term sheet with the Anchorage Water and Wastewater Utility to use their portal in October 2023, prior to hearing the public’s comments on the issue. Throughout this process, we have heard members of the public express that they wish to hear the sentiments of other member-owners on this issue. The public comment process did not allow for member-owners to hear each other, nor to hear directly from a party that is deeply impacted, The Native Village of Eklutna.

The Native Village of Eklutna has suffered immense harm as their river and fish were stolen from them in order to power Anchorage. Eklutna people have consistently helped Anchorage by providing land for schools and a power plant, and resources for the railroad. The Native

Village of Eklutna was not an original party to the dam agreement, nor are they a hydro owner—which is itself an injustice—but they are an important stakeholder in this mitigation process. The utility owners have consistently held meetings with the Native Village of Eklutna, and subsequently ignored their desires. The Native Village of Eklutna has consistently stated they want fish passage from the lake to the ocean. The mitigation process is a historic opportunity that should not be taken for granted. It is time for the utility owners and the community of Southcentral as a whole to take this crucial step toward righting a historic wrong of colonization.

Across the country, dams are being torn down as the harm they've inflicted upon the fish, land, and native peoples is being recognized. As Alaskans, we have an opportunity to right a grievous wrong and re-introduce a salmon run within upper Cook Inlet. We have an opportunity to protect the incredible natural resources within our state and prevent this land from being razed as it has in the Lower 48. We cannot fail our salmon as they have in Washington, Oregon, California, and Idaho. We need to do whatever we can to improve fisheries and give salmon the greatest chance of survival. This is a generational project. We cannot afford to think in the short term, as we have done for so long. There is an opportunity for fish to return, for our children and our grandchildren. The time is now. Renewable energy, salmon runs, and tribal sovereignty are not mutually exclusive. This river needs adequate flows and connection to the lake, morally and legally, and the proposed plan is insufficient to achieve these objectives.

Sincerely,

The Alaska Center



Chantal de Alcuaz
Co-Executive Director
Cell: (907) 250-9621
she/her/hers



Dena'inaq elnen'aq' gheshtnu ch'q'u yeshdu. (Dena'ina)

I live and work on the land of the Dena'ina. (English)

Translation by Joel Isaak and Sondra Shaginoff-Stuart