



# Chickaloon Village Traditional Council (Nay'dini'aa Na' Kayax)

## VIA EMAIL/MAIL

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*Chairman/Elder*

Philip Ling,  
*Vice-Chair*

Cheryl Sherman,  
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Doug Wade,  
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February 19, 2024

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Re: Comments in Support of Eklutna Salmon and a Free-Flowing Eklutna River

To Whom it May Concern,

Chickaloon Native Village (CNV) is a federally recognized Ahtna Dene Tribe in southcentral Alaska, governed by Chickaloon Village Traditional Council (CVTC). CNV's ancestral territory and traditional area of influence include trading trails that span from the Beaufort Sea to the Copper River Delta. This territory also encompasses much of southcentral Alaska, Upper Cook Inlet, the Copper River Region, the Alaska Range, the Matanuska River watershed, and the Susitna River watershed. We acknowledge that this region overlaps neighboring Dene and other Tribal traditional customary use areas, including those of the Native Village of Eklutna. Actions that occur within Dene traditional ancestral territory and customary area of use (as noted above) may impact the environment, Dene cultural resources, and the health of Tribal citizens and community members.

CVTC fully supports the Native Village of Eklutna's vision for Eklutna Watershed:

- The Eklutna River running freely, continuously, and naturally from its glacial headwaters through its dramatic canyon and its productive estuary to the marine waters of Cook Inlet.
- All five species of Pacific salmon (King, sockeye, silver, pink & chum) again swimming freely from Knik Arm through the entire length of the Eklutna River to their spawning grounds at Eklutna Lake.
- An abundant salmon fishery that supports the Eklutna Dena'ina and the people of Southcentral Alaska.
- Eklutna Lake, centerpiece of Chugach State Park, full to its natural lake level to support sockeye salmon shore spawning and human-powered recreation.
- An Eklutna River that rebalances the needs of fish, the Eklutna Dena'ina, drinking water for Anchorage, and low-carbon power production.

CVTC fully supports the comments and position of the Native Village of Eklutna (NVE) as presented in their December 4, 2023 comments on the Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage ("Project Owners")'s Eklutna Hydroelectric Project Draft Fish and Wildlife Program ("Draft Program"). NVE's

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letter clearly presents the biased inadequacies of the Draft Program and CVTC agrees fully with NVE. The Draft Program fails to meet the fundamental purpose of the 1991 Eklutna Fish and Wildlife Agreement.

From page 4 of NVE's December 4, 2023 comments:

*NVE's alternative of dam removal within ten years will provide fish passage upstream and downstream to and from the lake and upper tributaries and return the river's natural flow regime that salmon co-evolved to depend upon, restoring the entire river and lake ecosystem. This proposal aligns closely with National Marine Fisheries Service ("NMFS"), US Fish and Wildlife Service ("USFWS"), and other Technical Working Group ("TWG") member's study period preferred alternatives with fish passage to and from the lake and flows that closely mimic the river's historic natural flow regime. The Conservation Fund has pledged to pay all the costs of removing the Eklutna Lake dam.*

From page 12 of NVE's December 4, 2023 comments:

*The preferred alternative [of the Project Owners] continues to create a dead-end river, with over a mile of dry streambed below the dam. Creating a dead-end river hardly mitigates the damages caused to fish and wildlife from the Project because it prevents connectivity between Knik Arm, the lower Eklutna River, the lake, and the upper tributaries. The preferred alternative cannot mitigate damages to sockeye in any way because it will continue to prevent nearly all anadromous sockeye from spawning in the Eklutna River system. Because the destruction of the sockeye run was the "specific concern" leading to the Agreement, a Program that continues to prevent almost all sockeye from spawning is impermissible. The preferred alternative permits less than 10% of the river to flow down its historic channel to the Knik Arm, the smallest amount of any proposed alternative.*


CVTC staff have taken the time to review the Eklutna Fish and Wildlife Program draft, the Cultural Resources Report, and Native Village of Eklutna's (NVE) comments dated December 4, 2023. CVTC fully supports NVE's response to the Draft Program including NVE's Traditional Ecological Knowledge (TEK) that has been ignored throughout the report. CVTC will remind the "Project Owners" that the Indigenous peoples of Alaska are the Original People of the land and understand its ecosystems far longer than Euro-Americans and colonists that have moved in over the last 150 years into the immediate area.

The following concerns regarding the Cultural Resources Report as follows:

- 2.1 Indigenous Occupation: "The United States purchased Alaska from the Russian Empire in 1867." This is technically not correct, by the Doctrine of Discovery and international laws on conquering nations, Russia technically only owned two forts on two different islands within Alaska, they never completely conquered Alaska or all its Indigenous Peoples.
- 5.1 Eklutna Lake Shoreline Survey – report mentions shovel tests were excavated along the lake shore but did not specify the screen mesh size. Was it 1/8" or 1/4"?
- Earliest cultural resources investigations noted in the report are 1983 to 1984, 40 years ago while the Eklutna river and lake had been disturbed with construction in the 1920s with no mention of archaeological survey. The report mentions considerable disturbance and bulldozing throughout construction, land clearing, and redirection of flow. It is likely considerable cultural resources were lost during this time and SOI-Q Archaeological and Tribal monitors should be present for all ground disturbance.

Lastly, the Draft Program assumes that all costs associated with dam modifications and restoration will be borne by the rate payers. This is unnecessary and highly unlikely, especially if there is extensive restoration for fish and wildlife habitats. The Conservation Fund has already (and repeatedly) agreed to fund removal of the Eklutna Lake dam and there are numerous federal grant funding sources available for fish habitat restoration activities. This funding information should be shared publicly and with the governor for more accurate understanding of the costs of the alternatives. CVTC appreciates the opportunity to comment on this biologically and culturally very important project and urges all decision-makers to restore fish passage to Eklutna Lake and the entire Eklutna Watershed.

May Nek'eltaeni (Creator) Guide our Footsteps,

  
Chief Gary Harrison (Feb 19, 2024 20:39 AKST)

Chief Gary Harrison  
Chairman






# 2024.02.19 CVTC Comment on Eklutna Dam

Final Audit Report

2024-02-20

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