



CHUGACH STATE PARK CITIZEN ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

Dear Eklutna Fish & Wildlife Program Development Team:

Municipality of Anchorage; Attn: Kolby Hickel
Chugach Electric Association; Attn: Andrew Laughlin
Matanuska Electric Association; Attn: Tony Zellers
McMillen Jacobs Associates; Attn: Samantha Owen
Hydro Regulatory Services; Attn: Steve Padula

The Chugach State Park Citizen Advisory Board (CAB) is a volunteer board composed of members of the public appointed by the Director of the Division of Parks & Outdoor Recreation. Among the CAB's purposes is a responsibility to "inquire into matters of community interest relating to State Parks and outdoor recreation". Furthermore, five primary purposes are outlined for Chugach State Park in statute (AS 41.21.120-41.21.125):

1. To protect and supply a satisfactory water supply for the use of the people.
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas.
3. To protect areas of unique and exceptional scenic value.
4. To provide areas for the public display of local wildlife.
5. To protect the existing wilderness characteristics of the easterly interior area.

We appreciate that the Program Development Team's mandate to select an alternative to fulfill the responsibilities of the 1991 Fish & Wildlife Agreement is an extremely complex task with a variety of implications for the Project Owners, Chugach State Park, the Native Village of Eklutna and the general public. The alternative implemented will have financial, cultural, recreational and environmental impacts for the next 35 years. While members of the CAB bring a diverse set of expertise and are personally sensitive to the wide array of potential implications of the various selected alternatives, as a board we remain focused on the potential impacts to Chugach State Park. Keeping both the CAB's purposes and the Park's purposes front of mind we respectfully submit the following comments on the 2023 Draft Fish and Wildlife Program.

We found the recreational study and subsequent discussion of impacts to recreation to be inadequate. While the recreational study did examine the *existing* quantity, frequency, location and type of recreation in the project area, it failed to sufficiently analyze how the park - and recreation - would be affected by the different alternatives. It also fails to account for future growth in recreation at Eklutna Lake over the project lifetime.

While both the Draft Summary of Study Results (Draft Study) and Draft Fish and Wildlife Program (Draft Program) acknowledge that substantial erosion has occurred to ~3.1 miles of the Eklutna Lakeside Trail - a direct result of the Project Owners' management of lake levels combined with wind caused wave action - there is no mention as to how to mitigate future trail damage. This mitigation is the responsibility of the Project Owners as laid out in the 1991 Agreement, and whichever alternative is selected should include a plan to

protect recreational assets such as the Lakeside Trail. Trail erosion primarily occurs at high lake levels when the lake is full (elevation 871 feet) and spilling via the ungated spillway, which has occurred 10 times since the dam was constructed in 1965 (Draft Program, Table 1-1, p.15). One infrastructure modification to the existing dam we encourage to be revisited is the fixed wheel gate. This would allow for more rapid drawdown of lake levels when the lake is full, preventing future damage to the Lakeside Trail. The fixed wheel gate also has the added benefit of allowing for increased channel maintenance flows, and is the preferred infrastructure modification to the existing dam favored by all entities except Alaska Division of Natural Resources and the Project Owners (Draft Program, Table 2-1, p.37-38).

The CAB is also concerned by the lack of specificity as to how the Project Owners will fulfill their obligation to contribute financially to needed repairs to recreation infrastructure. The Draft Study estimates the cost of Lakeside Trail Improvements to range from \$860,000 to \$3,441,000 (Table 2.9, p.60). However, the Draft Program abdicates responsibility for mitigation to trail damage by citing one time funding secured by a nonprofit partner (Section 3.3.2, p.57; Section 4.9 p.75). Unfortunately, the \$234,000 in state capital funds approved by the legislature in 2023 represents a small fraction of the estimated repair costs and a very short term fix for only a limited section of dangerous, badly damaged trail. This does not absolve the Project Owners from the obligation to develop a long term logistic and financial plan to repair the remainder of trail damage (as identified in the Draft Study, Section 2.11, p.53), prevent future damage, and maintain the integrity of trails and infrastructure in the future. Furthermore, there is a rather large discrepancy between estimated cost cited in the Draft Study referenced above versus the Draft Program. The total median cost cited in the Draft Program (Appendix D, Table 2-1) was \$1,347,100 less than that cited in the study results. This discrepancy should be reconciled.

While we acknowledge that the Project Owners are bound by the schedule laid out in the 1991 Agreement, multiple partners, including the Anchorage Assembly, have called for a delay to allow for time to better consider all alternatives. A delay would also allow the Project Owners to fully consider the dam removal alternative supported by the Eklutna Valley Community Council and the Native Village of Eklutna. The CAB supports a delay to allow the Project Owners and all interested parties to better analyze this option. With a 35-year implementation timeline, all parties will have to deal with the consequences of the selected alternative for decades to come.

Regardless of the alternative selected, the CAB expects the Project Owners to develop a plan to mitigate impacts to any recreational assets including, but not limited to, damage to the Eklutna Lakeside Trail. Additionally, in partnership with Chugach State Park and nonprofit partners, the Project Owners should establish an agreement and a corresponding fund to pay for assessments and repairs of existing and potential future damage to recreational assets over the lifetime of the project. The CAB recommends that the Project Owners make regular contributions to an approved financial vehicle equal to - at a minimum - the median estimated cost of trail repairs cited in the Draft Study. This financial burden should not be passed off to Chugach State Park, the State of Alaska or other nonprofit partners as it has in the past.

Sincerely,



Haley Johnston, Board Chair
Chugach State Park Citizen Advisory Board