



February 19, 2024

Sent via email

Eklutna Hydro Program Development Team
2607 Western Ave, Unit 360
Seattle, WA 98121

RE: Public comment on the draft Fish and Wildlife Plan

To the Eklutna Hydro Program Development Team:

Cook Inletkeeper is a community-based nonprofit organization formed by concerned Alaskans in 1995 to protect the Cook Inlet watershed and the life it sustains. Please accept these comments on the Eklutna draft Fish and Wildlife Plan on behalf of our organization and its more than 6,000 members and supporters throughout southcentral Alaska. Our concerns in this matter center on people and environmental justice, wild salmon and their habitat, and the critically endangered Cook Inlet beluga whale and its potential for recovery.

We support the people of the Native Village of Eklutna and their desire for wild salmon to thrive once again in the Eklutna River watershed providing for cultural practices and food sovereignty.

The 1991 Purchase Agreement allowed the Eklutna Project Owners to side-step the federal licensing process by FERC, thus official government-to-government consultation with Federally Recognized Tribes was not conducted thirty years ago, or likely any time before that. This injustice must be rectified. The people, who stewarded these lands and waters for thousands of years, must be respected as the priority stakeholders and their wishes and knowledge considered above all others in the selection of a final alternative.

We support removal of the Eklutna Lake Dam because it is the only alternative to meet the purpose of the Purchase Agreement.

The Purchase Agreement requires that the utilities work with key federal agencies to develop a Fish and Wildlife Plan with the purpose of developing and implementing measures to “protect, mitigate damages to, and enhance fish and wildlife (including related spawning grounds and habitat).” We agree with comments submitted by one of the key federal agencies - the U.S. Fish and Wildlife Service - which states that the draft plan does not meet the intent of the purchase

agreement because it does not address fish passage:

“The Program should provide connectivity to the lake, release year-round instream flows sufficient to support salmon spawning and rearing habitats throughout the river corridor, and accommodate periodic high-volume flows that maintain habitat characteristics through a self-sustaining dynamic equilibrium between the hydrograph and natural sediment supply.” (p. 3, [U.S. Fish and Wildlife Service](#) comments)

The inadequacy of the “Selected Alternative – Portal Release Facility” to achieve the intent of the Purchase Agreement should make it a nonresponsive option for the Fish and Wildlife Plan.

In addition to widely-shared concerns about the Selected Alternative providing inadequate stream flows to support downstream habitat, Inletkeeper rejects that three (3) years of winter temperature monitoring is adequate to assess thermal suitability of salmon habitat. With our rapidly changing climate and documented warming freshwater conditions in Cook Inlet salmon streams ([Mauger et al. 2017](#)), year-round monitoring is needed for a bare minimum of five (5) years.

We support removal of the Eklutna Lake Dam to create more foraging opportunities for beluga whales in their critical habitat in upper Cook Inlet.

The majority of the Cook Inlet beluga whale population forages at the mouth of the Eklutna River during the summer. Despite the obvious omission of the impact restored Eklutna salmon runs would have on potential recovery of this critically-endangered species, Inletkeeper requests that this analysis be completed and considered before a final alternative is selected.

We’d like to highlight comments submitted by one of the key federal agencies – NOAA and its National Marine Fisheries Services – regarding the link between beluga recovery and an increase in Eklutna salmon:

Listed as endangered in 2008, the Cook Inlet beluga has experienced continued population decline and range retraction, with the entire population now occurring primarily in the upper and middle Inlet. Pacific salmon are a key prey item for Cook Inlet belugas, and the geographic distribution of the whales is strongly influenced by seasonal fish runs. Knik Arm, into which the Eklutna River flows, is important Cook Inlet beluga whale foraging habitat. In addition, Knik Arm, including the mouth of the Eklutna River, is designated critical habitat for the population. ... Improving fish passage and habitat connectivity, as we recommend here, is anticipated to have beneficial effects to both the Cook Inlet beluga whale and its critical habitat and will support recovery of the population. (p. 6, [NMFS](#) comments)

Conclusion

Inletkeeper wholeheartedly supports renewable energy solutions to our climate and local energy crisis. By removing the Eklutna Lake Dam, the Railbelt will lose 3-4% of its generation capacity; however, this loss can be easily made up by renewable energy project coming online in the near future. We believe the Community Supported Alternative is the solution that is a win for people, a win for salmon, and a win for belugas. We support removing the Eklutna Lake Dam in the next 10 years with great investment by the conservation community and restoring the Eklutna River and its wild salmon populations to benefit the Native Village of Eklutna and all the Alaskans who recreate and enjoy the area.

Thank you for considering these comments,

A handwritten signature in black ink that reads "Sue Mauger". The signature is written in a cursive style with a large, sweeping flourish at the end.

Sue Mauger
Science Director
sue@inletkeeper.org