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To: [Sam Owen](#)
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Subject: Comments on the Eklutna Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 3:06:34 PM

Dear Ms. Owen and Chugach Board members,

I am writing to support full restoration of the Eklutna River. I'm a fisheries scientist with over a decade of experience working for the Alaska Department of Fish and Game and Tribes in Alaska on salmon fisheries. I currently work as the Restoration Policy Manager for an indigenous conservation organization based on the Klamath River, working with Tribes on post-dam removal efforts. I've also served on the municipality of Anchorage's Watershed and Natural Resources Commission, where we received several presentations on Eklutna River restoration from agency scientists. I've served as the Vice-President, President-Elect, President, and Past-President for the Alaska Chapter of American Fisheries Society and sit on the Advisory Council for the University of Alaska College of Fisheries and Ocean Sciences. I want to address three areas that drive my support for full restoration of the Eklutna River.

1. Full restoration is what the Native Village of Eklutna (and many other community members) want and, frankly, deserve.

The colonial taking of indigenous lands has been and continues to be one of the world's greatest environmental injustices. The construction of the Eklutna dam, the original agreement (and how the Tribe was excluded), the years the owners have let slip by without coming up with a reasonable approach to rehabilitation of the river, and this sham of a public process currently being undertaken is no exception. It is baffling to me that many in Alaska continue to stand by this colonial mindset and refuse to acknowledge the historical trauma that has been inflicted on the Native Village of Eklutna. You have a chance here to right the wrongs of history with full restoration of the river; anything but full restoration will be a choice you're making to instead barrel ahead with continued ignorance.

I'm currently involved in a Department of Energy funded effort called Uncommon Dialogue: Hydropower, River Restoration, and Public Safety, which brings together stakeholders from the hydropower industry, conservation groups, and Tribes to find common ground on hydropower reform in the United States. It is unprecedented to think that these groups, historically at odds, could agree on something, but Uncommon Dialogue showed that it was possible. Through this effort, the group provided joint recommendations to Congress related to hydropower reform that "reflected the groups' shared goals of enhancing the health of river ecosystems, respecting the rights of Tribes, and providing greater regulatory certainty for hydropower facilities". (found here: <https://woods.stanford.edu/research/hydropower/hydropower-ucd-core-documents>)

While the Eklutna dam is not a FERC-licensed dam and therefore is exempt from federal regulations through the Federal power Act, it was the intention of the original signers of the agreement to adhere to standards equal to the federal licensing process. You have undoubtedly received a number of comments about how you have failed to meet that standard, so I won't belabor that here. Instead, I want to focus on the recommendations made by the diverse group brought together through Uncommon Dialogue and highlight how river restoration and hydropower are being addressed throughout the rest of the country - and how Tribes are being uplifted in the process, rather than trampled or, in Eklutna's case, ignored. In particular, a bi-

partisan bill before Congress now - widely supported by the hydropower industry, environmental groups, and Tribal organizations (see statements of support here: <https://www.daines.senate.gov/2023/06/14/what-they-are-saying-industry-and-community-leaders-endorse-daines-bipartisan-hydropower-bill/>) - **empowers Tribes and recognizes their inherent decision-making authority to prevent future environmental and economic destruction on their ancestral lands**, and increases the cooperation between among Tribes and federal and state agencies in this effort. A bi-partisan effort in Congress is elevating the voices of Tribes in hydropower issues, while the approach pursued by the project owners here seeks to stifle Tribal input. Why are we doing things differently in Alaska?

There is a clear example for you to follow here and involve and genuinely listen to the Native Village of Eklutna. The rest of the country is showing you the way - will you follow or will you continue to perpetuate the decades-long environmental injustice?

2. Full restoration is the only viable option for restoration of sockeye salmon.

Sockeye salmon spawn in lakes. To restore the Eklutna River sockeye run, they need full, unobstructed access to the lake. Full restoration - ie dam removal - is the only option here.

Unfortunately, the spokesperson for the utilities is trying to mislead you into believing that sockeye salmon never occurred in the lake, citing a study published in 2017. The study examined the nitrogen isotopic signature of sediment cores as a way to document possible historic salmon spawning. My Ph.D. thesis used stable isotopes of nitrogen and carbon to reconstruct the historical food web of the Great Lakes fisheries. I'm quite familiar with using isotopes to study the historical ecology of ecosystems. They can be an invaluable tool, but like most scientific methodologies, they are not without flaws. I won't go in to details, as Rick Sinnot provided an excellent overview of these potential flaws in his editorial in the ADN (<https://www.adn.com/alaska-life/we-alaskans/2017/12/02/fishing-for-prehistoric-traces-of-sockeye-salmon-in-eklutna-lake/>). No scientific study should ever be interpreted in isolation. That's just bad science. As scientists, we replicate. We conduct other complementary studies. We look at oral history to help inform the results we're seeing for any given ecosystem. And oral history, as provided by the Native Village of Eklutna, tells us that there were certainly sockeye salmon present in the lake. The 2017 study authors state "...we contend that even a conservative interpretation of the model results demonstrates the possibility that sockeye salmon could have used Eklutna Lake before 1929 without leaving a detectable isotopic signature." Nevermind that kokanee - which are landlocked sockeye - are present in the lake today, most likely a relic of the historic anadromous population. If kokanee are present in any appreciable numbers, it's because of a relic population - not because someone threw a few sockeye in the lake at some point. The takeaway here is that the spokesperson for the utilities is not providing the full story and is cherry-picking from the study they are citing to serve utility interests. Please do not be duped.

3. Full restoration is, indeed, economically and logistically feasible.

Thanks to the generous offer of environmental groups, full restoration of the Eklutna River is, in fact, the most economically feasible option. The utilities won't have to pay a penny to remove the dam - far better than the utilities/ratepayers on the Klamath River which, by the way, are removing the dams because it was cheaper than building fish passage facilities to come in compliance with federal law... and because of widespread public support, not unlike the situation on the Eklutna River. And logistically speaking, it will be a relatively minor lift compared to other river restoration efforts happening around the country. If the power companies, state and federal agencies, Tribes, environmental groups and other stakeholders

can come together to remove (much larger and multiple!) dams on the Elwha and Klamath Rivers, then we can realistically remove a small, single dam on the Eklutna River.

Claims that removing the dam and AWWU winter water withdrawals would cause the river to dry up at times are - to date - not backed up with credible, reviewable science. It's impossible for any reputable hydrologist to review these claims by the project owners given the lack of transparency around their analysis. And in my professional opinion, the analysis does not seem to take into account changes in lake levels with predicted climate change impacts in Alaska. Models are showing higher winter lake levels in Alaska, as winter precipitation shifts from predominantly snowpack to more rain (<https://www.nps.gov/articles/aps-19-1-10.htm>), which would offset AWWU winter withdrawals.

I strongly encourage you to slow down your process and work with the Native Village of Eklutna to achieve a common, shared objective of rightfully returning salmon to the ecosystem while meeting water and power needs for the municipality. There are numerous examples to learn from where utilities, agencies, and Tribes are working together in the L48 on these same issues. I can't think of what would hold you back from taking a more thoughtful, holistic approach, can you?

Thank you for your consideration,
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Restoration Policy Manager, Ridges to Ripples Indigenous Conservation Group

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