

From: [Suzann Speckman](#)
To: [Sam Owen](#)
Subject: Public comment
Date: Monday, February 5, 2024 11:24:09 PM

To the Owners of the Eklutna Hydroelectric Project,

The 1991 Eklutna Fish and Wildlife Agreement required the Project Owners to develop and propose to the Governor a program to “protect, mitigate damages to, and enhance fish and wildlife impacted by the project.” The alternative under consideration as the Draft Program does not meet the goals of the 1991 Agreement and is therefore inadequate. A different alternative must be considered that truly mitigates the damage done by years of diverted river flow, and truly enhances the fish and wildlife populations that were impacted.

I heard that someone called the proposed alternative a “Dead-End River,” and that is regrettably true. The proposed alternative leaves one full mile of riverbed dry, with no water, which will prevent fish from reaching Eklutna Lake. As reported in the Anchorage Daily News on 04 February 2024, an engineering consultant, Don Spiegel of GV Jones & Associates, studied the portal valve that is key to the proposed alternative. These experts concluded that the portal valve would provide inadequate and irregular water flows to fish in the 11-mile section of the Eklutna River that is proposed to be re-watered. If salmon in those 11 miles of river would suffer periodic die-offs from inadequate and irregular water flow, as these experts determined, the proposed alternative becomes even less acceptable.

Why would we spend \$57 million dollars for half of a project that fails to mitigate damages to Eklutna Lake, fails to mitigate damages to salmon in the river, and fails to accomplish the purpose of the 1991 Eklutna Fish and Wildlife Agreement?

The Eklutna Dena’ina people are clear in their desire to see the Eklutna River run wild again, along its full length, with healthy salmon runs in its tributaries and in the lake.

Allowing runs to rebuild for all five salmon species in the Eklutna River and Eklutna Lake would protect salmon populations and mitigate previous damages to salmon populations. It would also mitigate damages to other species that resulted when salmon runs in the Eklutna system were destroyed by installation of the hydroelectric system. Humans, especially the Eklutna Dena’ina people, would benefit from being able to fish in their traditional areas and ways. Bears and other fish-eaters would have more food, and browsers like moose would benefit when the nutrients from salmon carcasses spread into the surrounding riverside vegetation.

One of the most important species that would benefit from rebuilding salmon runs in the Eklutna system is the Cook Inlet beluga whale, which is listed as endangered under the Endangered Species Act. In the 2016 Cook Inlet Beluga Recovery Plan, NMFS listed anthropogenic disturbance and cumulative impacts as threats of high concern and prey availability as a threat of medium concern (NMFS 2016). Since publication of the Recovery Plan, evidence continues to accumulate that Cook Inlet beluga whales are suffering from limited prey resources, and this is contributing to the failure of the population to recover in numbers. Recent studies of Cook Inlet beluga whales conclude that reductions in prey availability, especially from late spring to early fall, adversely affect vital rates of Cook Inlet beluga whales (Norman et al. 2020, Warlick 2022, McHuron et al. 2023, Warlick et al. 2023). McHuron et al. (2023) also found that intermittent disturbances that resulted in lost foraging opportunities, such as those caused by anthropogenic activities during the ice-free season, had little impact on body condition or vital rates if prey were abundant during the summer and early fall.

In other words, availability of salmon and other prey influences beluga whale adult and calf survival, calving rates, age of first reproduction, interval between successive calves, and other life history characteristics. These in turn drive population trends. Beluga whales in good body condition, with

abundant prey, are better able to tolerate anthropogenic activities such as those that create noise.

Loss of the salmon runs in the Eklutna River and Eklutna Lake may be one of the many reasons the Cook Inlet beluga whale population is lagging in its recovery. Removing the dam and allowing full passage of the Eklutna River and Eklutna Lake to the five species of salmon would also increase prey availability to endangered Cook Inlet beluga whales. Removal of the dam is a remarkable opportunity to “enhance fish and wildlife impacted by the project,” a stated goal of the 1991 Eklutna Fish and Wildlife Agreement, by enhancing the likelihood of survival of the endangered Cook Inlet beluga whale.

Removing the Eklutna dam to provide access for salmon to the full reaches of the Eklutna River and Eklutna Lake is an easy, concrete, quantifiable recovery action for both the five species of salmon and the endangered Cook Inlet beluga whale. We know that beluga whales use Knik Arm occasionally in early summer and daily in summer and fall from about August to October or November. Beluga whales forage in Eagle River and Ship Creek. They likely foraged in the Eklutna River when salmon were abundant there. Red salmon are a favored prey species for beluga whales, and their smaller size makes them more available to younger animals that cannot swallow a larger king salmon. Red salmon need access to Eklutna Lake to spawn and grow, and would become available to beluga whales in Knik Arm.

The Native Village of Eklutna is proposing a very reasonable compromise alternative that involves a delay in removal of the dam until more renewable energy sources have been developed. This alternative deserves closer examination because it more closely adheres to the goals of the 1991 Eklutna Fish and Wildlife Agreement to develop and propose a program to “protect, mitigate damages to, and enhance fish and wildlife impacted by the project.” Community partners have committed to help offset costs of the dam removal, reducing the burden on public funds.

Please fulfill the intent of the 1991 Eklutna Fish and Wildlife Agreement and listen to the local people, scientists, and engineers who advocate for a healthy Eklutna River and Eklutna Lake system with access to the full 12 river miles and lake for salmon.

Finally, the Anchorage Daily News article on Sunday, 04 February 2024, described some confusing aspects of the proposed alternative that we simply do not yet understand. This includes a secret agreement between the utilities that will impact prices and the water rights of Anchorage. Not only should the alternative put forward support full passage for salmon, but I agree with the Assembly’s proposal to delay the decision on the preferred alternative until the new information about contracting is analyzed and understood. The outcome of the process is too important to be rushed or hidden from the public’s understanding.

Thank you for your consideration.

Sincerely,

Suzann G. Speckman

Literature Cited

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