

From: [Ron Rickman](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 11:04:11 AM

Thank you for the opportunity to comment on the Eklutna Hydroelectric Project Draft Fish and Wildlife Program (Program). This Program is a requirement of the 1991 Fish and Wildlife Agreement Snettisham and Eklutna Projects to “Develop and implement measures to protect, mitigate damages to, and enhance fish and wildlife (including related to spawning grounds and habitat)”.

Project owner proposed winter instream flows of 27 cubic feet per second (cfs) and summer flows of 40 cfs are inadequate and do not fulfil the requirement of the 1991 agreement. This has been clearly pointed out in written responses from USFWS, NMFS, ADF&G, NVE, and others. The Bradley Lake Hydroelectric Project, in comparison, ensures Bradley River instream flows of 40 cfs in the winter and 100 cfs in the summer. These instream flows have been used successfully for over 30 years. Note the Bradley and Eklutna watersheds have a lot of commonalities including watershed size, lake size, and glacier fed lake inflow.

Project owner proposed maintenance flow of 220 cfs for 3 of 10 years may be inadequate. Maintenance flows suggested by USFWS, NMFS, ADF&G, NVE, and others range between 325 cfs and 700 cfs, with a frequency ranging from 3 of 10 years to annually. For comparison, Bradley River maintenance flows, derived from the unregulated North Fork, exceed 500 cfs 3 of 10 years.

The Project owners proposed Eklutna River release facility design does not allow for increased instream and maintenance flow if their proposed flows don’t sufficiently improve habitat as expected. There should be some flexibility to increase these flows.

The Project owner proposed program does not address sockeye habitat restoration and connectivity to Eklutna Lake. While sockeye restoration is not specifically mentioned in the 1991 agreement, the Divestiture Summary Report: Sale of Eklutna and Snettisham Hydroelectric Projects by the Alaska Power Administration, U.S. Department of Energy, April 1992, page 19, states “During reviews of legislative proposal, loss of key sockeye salmon run that once spawned in Eklutna Lake was identified. The loss was caused by a private power project constructed in the 1920’s. The loss was not identified in pre-authorization studies for the Federal Eklutna Project and the Federal project does not include mitigation. This specific problem and the desires of the fish and wildlife agencies to provide appropriate consideration to fish and wildlife resources over the long run led to the August 7, 1991 agreement”. The 1920’s dam was removed in 2018 so the last remaining barriers preventing fish passage to Eklutna Lake are the existing configuration of the Eklutna Dam and the Program plan that leaves one mile of dry river bed. Sockeye restoration should be considered, including determination of viable spawning and rearing habitat in the Eklutna River, Eklutna Lake, and streams that feed into Eklutna Lake.

Railbelt energy production and cost to consumers are important. The Eklutna Hydroelectric Powerplant cannot generate electricity at its current level while releasing adequate instream and maintenance flows to the Eklutna River. A reasonable solution is developing the Dixon Diversion at Bradley Hydro which is estimated to produce 160,000 megawatt hours (MWH) annually, a significant increase over the average annual 102,000 MWH currently produced by Eklutna Hydro.

Cost burden for modifying, removing, or replacing the Eklutna Dam to allow sockeye passage doesn’t have to be paid exclusively by utility rate payers. The 1920’s dam was removed by an amazing collaboration between the Conservation Fund, Eklutna Inc., and the Native Village of Eklutna. Similar collaboration with many potential partners should be explored for sockeye mitigation.