



MATANUSKA-SUSITNA BOROUGH

Fish & Wildlife Commission

Planning and Land Use Department

Planning Division

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February 9, 2024

Ms. Samantha Owen
Senior Regulatory and Licensing Consultant
McMillen Jacobs Associates
1101 Western Avenue, Suite 706
Seattle, Washington 98104

Re: Preferred alternative for the Eklutna Hydroelectric Project – restoration of Eklutna River and Lake salmon habitat and production

Dear Ms. Owen:

The Matanuska Susitna Borough Fish and Wildlife Commission (FWC) represents the interests of the Borough in the conservation and allocation of fish, wildlife and habitat. Specifically, the FWC advises borough officials, state or federal agencies and other organizations with interests that may affect conservation of fish, wildlife, and habitat across an area the size of West Virginia. Within this area, residents fish commercially, personal use dip net, sport fish, and four indigenous communities are important subsistence users—Tyonek, Knik, Eklutna and Chickaloon. The members of the FWC combined bring well over 150 years of experience managing fish and wildlife resources within Alaska.

It is the understanding of the FWC that in your capacity you represent the three owners of the Eklutna Hydroelectric Project. Pursuant to the 1991 Fish and Wildlife Agreement for Snettisham and Eklutna Projects we would like to provide our recommendations in the restoration of the historically important Eklutna River and Lake. In our opinion for this to be accomplished per the 1991 agreement will require sufficient water flows to support passage of anadromous fish species to and from Eklutna Lake to the confluence of the Knik River. United States Congresswoman Ms. Peltola clearly articulates that in authorizing the sale of the Eklutna Hydropower Project it was the intent of Congress that the Utilities must mitigate for drying up the Eklutna River. How best to accomplish this will require an investment that if done correctly will demonstrate how this hydroelectric project can be done responsibly and would gain a much broader public and environmental support. The recommendations offered by the National Marine Fisheries Service are proven steps which would provide for the positive outcome in meeting the objectives of the 1991 agreement. The FWC supports these recommendations and those offered through resolution by the Native Village of Eklutna.

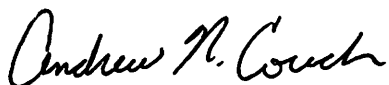
It is important to note and clarify that the analysis performed by McMillen in addressing the potential spawning and rearing habitat for anadromous fish species and the primary productivity of Eklutna Lake seems to ignore the production of very similar lakes within Alaska. It also seems to ignore the effects of salmon carcasses in providing nutrient amendments for sustaining and restoring stream and lake productivity.

The portal option is not a vital option if in fact the goal is to restore both the river and lake to their historical production. Leaving approximately 1 mile of dry riverbed definitely fails to connect the river to the lake and would ignore the goal of restoring the lakes' productivity. Basic understanding of fish production clearly points to the need of having both Eklutna Lake and River connected by continuous water flow.

Providing fish passage from the river to the lake when properly engineered has been demonstrated in many river/lake systems throughout the Pacific Northwest. Here in Alaska, one only has to look as far as Kodiak Island and the Frazer Lake system. Frazer Lake is the second largest lake on Kodiak, and was barren of anadromous fish. A 10-meter waterfall stood as a barrier for sockeye salmon heading back to their natal waters to spawn. A fish pass was constructed around the barrier, which allowed fish to autonomously migrate up and access Frazer Lake and tributary spawning habitats. Frazer Lake is one of the most successful introduced runs in the world and a major producer of sockeye salmon in the Kodiak Management Area, with annual runs exceeding 1 million in recent years. When comparing Eklutna Lake to Frazer Lake surface acres you find very similar sizes, 3,520 and 3,978 acres respectively.

An important point to consider, implementing a sound mitigation plan which not only restores fish production in this historically important system, is also an important step in maintaining and protecting the health of salmon in the Upper Cook Inlet area, the body which connects migratory salmon to the waters of the Matanuska Susitna Borough. The FWC greatly appreciates the coordination and work which has gone into this planning process. We look forward to a final plan which recognizes a process which brings back a salmon resource so important to us all.

Sincerely,



Andy Couch, Chair
Mat-Su Borough Fish and Wildlife Commission