



## Ninilchik Traditional Council

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February 9, 2024

Submitted via Email to:

Samantha Owen <[owen@mcmillen.com](mailto:owen@mcmillen.com)>

Samantha Owen

Senior Regulatory Consultant

McMillen Inc.

2607 Western Ave, Unit 360

Seattle, WA 98121

Re: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

The Ninilchik Traditional Council (NTC), governing body of the federally and state recognized Ninilchik Village Tribe, supports the Native Village of Eklutna (NVE) Eklutna River Restoration goals of their Resolution 2022 – 4; “Łiq’a nagh qinqtudeł - We are hopeful the salmon will return to us.” “This includes 1) continuous flow in the river below the lake sufficient to support thriving salmon populations, with intermittent higher, habitat maintenance and re-creation flows, 2) salmon passage between Eklutna River and Lake, and 3) moderation of Eklutna Lake level variability, at levels sufficient to facilitate sockeye spawning.”

No water is currently released downriver from Eklutna Lake, with 90% diverted for hydroelectricity generation. Fish passage is blocked to 8 miles of sockeye habitat in Eklutna Lake and 15 miles of Chinook and coho habitat in its tributaries at the Eklutna lake outlet dam. Kleinschmidt habitat assessments find abundant potential sockeye spawning habitat around Eklutna Lake, if provided restoration of fish passage at the lake dam and sufficient lake levels. Also, NVE habitat assessments found abundant Chinook and coho habitat in the Eklutna Lake tributaries, which only await restored fish passage to facilitate restored runs.

The electric utilities have put forward a Draft Fish and Wildlife mitigation Program “portal option” which would release minimal flows to the lower river from the Anchorage water supply pipe a mile below Eklutna Lake, leaving a dry river above that. It would be insufficient to restore historic multiple and side channels, and off channel habitat. Fish passage would remain blocked to sockeye habitat in Eklutna Lake and Chinook and coho habitat in the lake

tributaries. It ignores the advice and options submitted by NVE, resource agencies and other groups.

NTC joins NVE and allied organizations involved in the multi-year effort to restore the Eklutna River in advocating for removing or replacing the dam at the outlet of Eklutna Lake to allow adequate flows downriver and fish passage to upstream habitat. Dam removal is the cheapest option and NVE allies have offered to pay for it. Water could still be drawn for Anchorage's needs and some for power generation. This could be implemented within 10 years, once renewable energy alternatives are in place, allowing the river to flow more naturally. Thank you.

Sincerely,

NINILCHIK TRADITIONAL COUNCIL

A handwritten signature in black ink, appearing to read "Ivan Z. Encelewski", with a horizontal line extending to the right.

Ivan Z. Encelewski  
NTC Executive Director

cc: Aaron Leggett, President, Native Village of Eklutna  
Marc Lamoreaux, Land and Environment (Ełmena) Director, Native Village of Eklutna  
Comments emailed to <info@eklutnahydro.com>