
Technical Memorandum

To:	Eklutna Project Owners	Project:	Eklutna Fish & Wildlife Program
From:	Anna Lampman, McMillen, Inc.	cc:	Samantha Owen, McMillen, Inc.
Date:	April 15, 2024	Job No:	24-021
Subject:	Summary and Analysis of Public Comments on the Draft Fish and Wildlife Program		

1.0 Public Comment Process

Per the requirements of the 1991 Fish and Wildlife Agreement (1991 Agreement), the owners of the Eklutna Hydroelectric Project (Chugach Electric Association [CEA], Matanuska Electric Association [MEA], and the Municipality of Anchorage [MOA], collectively referred to as the “Project Owners”) distributed the Draft Summary of Study Results and Draft Fish and Wildlife Program (Draft Program) to the Parties to the 1991 Agreement (National Marine Fisheries Service [NMFS], U.S. Fish and Wildlife Service [USFWS], and the State of Alaska represented by the Alaska Department of Fish and Game [ADFG], Alaska Department of Natural Resources [ADNR], and the Alaska Department of Environmental Conservation [ADEC]) and the Native Village of Eklutna (NVE) on October 27, 2023. The Project Owners received comment letters from the Parties, NVE, and Eklutna, Inc. and met with each entity in December 2023 to attempt to resolve differences. The Project Owners then held a series of public meetings in January 2024 and received public comment through February 19, 2024. Both draft documents and all comments received are publicly available on the Project website (www.eklutnahydro.com).

1.1 Public Meetings

The 1991 Agreement specifies that once the Project Owners received comments and recommendations on the Draft Program from the Parties, they must hold at least one public meeting each in Anchorage and the Matanuska Valley to receive public comments on the Draft Summary of Study Results, the Draft Program, and the comments and recommendations of the Parties. Per the 1991 Agreement, the Project Owners published notices about the public meetings in the Anchorage Daily News, the Frontiersman, and the People’s Paper. These newspapers serve Anchorage, the Matanuska Valley, and Eagle River. The notices specified meeting places, times, and dates; where studies, reports, and recommendations could be obtained for review; and where written comments could be sent. The locations, times, and dates of the public meetings were also presented on the Project website homepage. The Project Owners advertised the public meetings in their member newsletters, social media, and announcements at civic meetings, including the Chambers of Commerce and community

councils. The Project Owners went beyond the requirements of the 1991 Agreement and held a total of six public meetings: two in Anchorage, two in the Matanuska Valley, and two in Eagle River. Public meetings were held at the following dates, times, and locations:

1. January 16, 2024, 2:00 – 4:00 p.m., Palmer Community Center (Depot), Palmer (36 people in attendance)
2. January 16, 2024, 6:00 – 8:00 p.m., Palmer Community Center (Depot), Palmer (23 people in attendance)
3. January 17, 2024, 2:00 – 4:00 p.m., The Arctic Rec Center, Anchorage (45 people in attendance)
4. January 17, 2024, 6:00 – 8:00 p.m., The Arctic Rec Center, Anchorage (37 people in attendance)
5. January 18, 2024, 2:00 – 4:00 p.m., Workplace and Event Center, Eagle River (37 people in attendance)
6. January 18, 2024, 6:00 – 8:00 p.m., Workplace and Event Center, Eagle River (28 people in attendance)

At each public meeting, the Project Owners gave a presentation describing what was included in the Draft Program and why, as well as what was not included in the Draft Program and why. The subject matter experts that conducted each study were available to answer questions on their respective studies and had posters summarizing the study results. Sign in sheets from each public meeting are included in Appendix A.

1.2 Opportunities to Submit Public Comments

The Project Owners accepted public comments from October 27, 2023 (the date the Draft Program was publicly available for review) through February 19, 2024 (30 days after the final public meeting). Throughout the public comment period, comments were submitted via email (info@eklutnahydro.com) or the “Contact Us” form on the Project website (www.eklutnahydro.com).

At each public meeting, comment forms were available for members of the public to fill out and submit on-site or to take with them and mail in later. Members of the public could opt to submit their comments verbally by making a 3-minute (or less) audio recording. The Project email address was advertised on the comment forms available at each public meeting and on the home page of the Project website. A QR code directing users to the “Contact Us” page on the Project website was also printed on all comment forms.

2.0 Public Comment Summary

Public comments were received via audio recording at the public meetings, comment forms distributed at the public meetings, emails to info@eklutnahydro.com, submissions on the www.eklutnahydro.com website, and form letters submitted through Trout Unlimited, The Alaska Center, and SalmonState. The Project Owners sent a response to each person who submitted their comment electronically, including form letters, to acknowledge receipt. Table 2-1 shows the number of public comments received in each format.

Table 2-1: Public Comment Breakdown

Format	Total
Audio Recordings	3
Comment Forms	19
Emails	241
Website Submissions	110
Form Letters	1,299
Total	1,672

2.1 Individual Comments

Table 2-2 provides a breakdown of the total number of individual comments received in each format as well as the general message of the comment. Verbatim copies of all individual comments received are provided in Appendix B, including transcriptions of the three audio recordings, and discussed in further detail in the sections below.

Table 2-2: Individual Comments Breakdown

Format	No Action	Support River Restoration	Support Draft Program	Against Draft Program	Support Dam Removal	Against Dam Removal	Questions / Other	Total
Audio Recordings	--	--	--	2	1	--	--	3
Comment Forms	1	1	3	4	5	3	2	19
Emails	2	10	19	23	76	87	24	241
Website Submissions	8	2	9	6	27	46	12	110
Total	11	13	31	35	109	136	38	373

2.1.1 Support No Action

One comment form from the public meeting, two emails, and eight website submissions (11 comments total) were received that did not support any changes to the existing Eklutna Project. These comments generally did not want any changes to the existing infrastructure or operations of the Project, essentially representing a “no action” alternative. An increase in costs to the ratepayer associated with all other alternatives was the primary factor influencing these comments. The loss in hydropower and drinking water resources was also important to these commenters. Several commenters also believed the anticipated salmon population for the Eklutna River to be low considering the overall cost of the alternatives presented.

2.1.2 Support General River/Salmon Restoration

One comment form from the public meetings, 10 emails, and two website submissions (13 comments total) were received that called for general river and salmon restoration in the Eklutna River. Most of the comments in this category were very general, showing support for bringing salmon populations back to the Eklutna River. These comments did not specifically support or oppose the Draft Program and did not mention dam removal as an alternative. Some of the comments stated that hydropower and drinking water were important resources provided by the Project, but that restoring salmon to the Eklutna River was also important.

2.1.3 Support Draft Program

Three comment forms from the public meetings, 19 emails, and nine website submissions (31 comments total) were received that explicitly stated the commenters support of the Draft Program. The general themes expressed in the comments were:

- The Draft Program is a good compromise between hydropower and drinking water resources and fisheries resources and the environment.
- The Draft Program was well drafted, well presented at public meetings, thorough, thoughtful, well written, and easy to understand.
- Support for hydropower as an affordable and reliable renewable energy source.
- Support for the AWWU Portal Valve alternative to improve habitat for salmon in the Eklutna River as well as recreational opportunities.
- The Draft Program followed the requirements of the 1991 Agreement.

2.1.4 Against Draft Program

Two audio recordings and four comment forms from the public meetings, 23 emails, and six website submissions (35 comments total) were received that were against the Draft Program. The comments in this category did not mention dam removal and were only comments on the Draft Program. Comments against the Draft Program included:

- Proposed minimum flows in the Eklutna River will not provide suitable aquatic habitat.
- The Draft Program leaves one mile of the river dry, from the Eklutna Dam to the AWWU Portal Valve, compromising salmon habitat in the Eklutna River.
- The Draft Program fails to mitigate the damages done to sockeye salmon by preventing them from entering Eklutna Lake to spawn.
- The Draft Program does not meet the requirements of the 1991 Fish and Wildlife Agreement.
- The development of the Draft Program did not follow the processes outlined in the 1991 Agreement.
- The proposed AWWU Portal Valve alternative is too costly for the lack of benefits it provides.
- The Draft Program does not sufficiently mitigate adverse impacts to NVE.
- Requests for a 2-year extension of time to perform additional analysis, consultation, and coordination with affected parties before proposing a Final Fish and Wildlife Program.

2.1.5 Support Dam Removal

One audio recording and five comment forms from the public meetings, 76 emails, and 27 website submissions (106 comments total) were received that supported removal of Eklutna Dam. Some of the comments showed opposition to the Draft Program, while others did not mention the Draft Program and only supported dam removal.

Many of the comments expressed support for the Community Plan to Bring Back the Eklutna (Community Alternative) put forth by NVE, Trout Unlimited, The Conservation Fund, and The Alaska Center on the www.eklutnariver.org website. The Community Alternative calls for *“removing the Eklutna Lake dam within the next decade, when replacement renewable energy is expected to be available.”*

2.1.6 Against Dam Removal

Three comment forms from the public meetings, 87 emails, and 46 website submissions (136 comments total) were received that were against the removal of Eklutna Dam. These comments did not mention or comment on the Draft Program and only discussed opposition to dam removal. The reasoning behind these comments included the costs associated with finding an alternative energy and water source, support for hydropower as a reliable renewable energy source, and fear of losing Anchorage's primary drinking water source. Some comments were also skeptical that removal of Eklutna Dam would result in flourishing salmon populations. Recreational resources at Eklutna Lake as well as existing salmon populations in the tailrace of the Project were also discussed as resources that would potentially be adversely affected by dam removal/decommissioning of the Project.

2.1.7 Questions/Other

The remaining two comment forms, 24 emails, and 12 website submissions (38 comments total) received during the public comment period were either questions about the Draft Program or did not fall into one of the aforementioned categories. Some of these comments discussed the desire to keep electricity rates low and did not state support or opposition to the Draft Program or dam removal. Other commenters presented their own ideas for consideration in the Draft Program or made broad overarching statements about river restoration and hydropower.

2.2 Form Letters

When NVE recommended dam removal in their comment letter on the Draft Program, several organizations including Trout Unlimited, the Alaska Center, and SalmonState initiated campaigns to advocate for dam removal. These campaigns included providing form letters on their websites for the public to sign their name and submit. Trout Unlimited distributed four different versions of a form letter, while The Alaska Center and SalmonState only distributed one. A copy of each form letter received, as well as the names of commenters who signed the form letters, is included in Appendix C.

A total of 1,299 form letters were received during the comment period. Most of the form letters received were from out of state (777 total) and some were received from parts of Alaska outside the Project service area (93 total); 429 form letters were received from residents within MEA, Chugach, and/or MOA service areas. A breakdown of the form letters received, including the area of residence and the organization responsible for posting the form letter, is shown in Table 2-3.

Table 2-3: Form Letter Breakdown

Form Letter	From Service Area	From Other Parts of Alaska	From Out of State	Total
Trout Unlimited	222	21	115	358
Version 1	43	4	51	98
Version 2	137	15	27	179
Version 3	35	2	37	74
Version 4	7	--	--	7
The Alaska Center	155	38	44	236
SalmonState	52	34	618	704
Total	429	93	777	1,298

Aside from Versions 2 and 3 of the Trout Unlimited form letters, which called for general river and salmon restoration on the Eklutna River, all of the form letters were against the Draft Program and supported removal of Eklutna Dam.

Several commenters submitted form letters more than once. In these instances, the first form letter received from an individual, regardless of which version, was kept in the record and all other submissions were removed.¹

3.0 Analysis

3.1 Individual Comments

In general, the individual comments received showed an even divide between commenters who opposed or supported general river/salmon restoration, who opposed or supported the Draft Program, and who opposed or supported dam removal, as seen in Figure 3-1 below. The largest variation was regarding dam removal with more individual commenters against dam removal (56%) than support it (44%). In general, this shows that individual commenters are nearly evenly divided on general river/salmon restoration, the Draft Program, and dam removal.

¹ A total of 287 repeat commenter form letters were removed from the record.

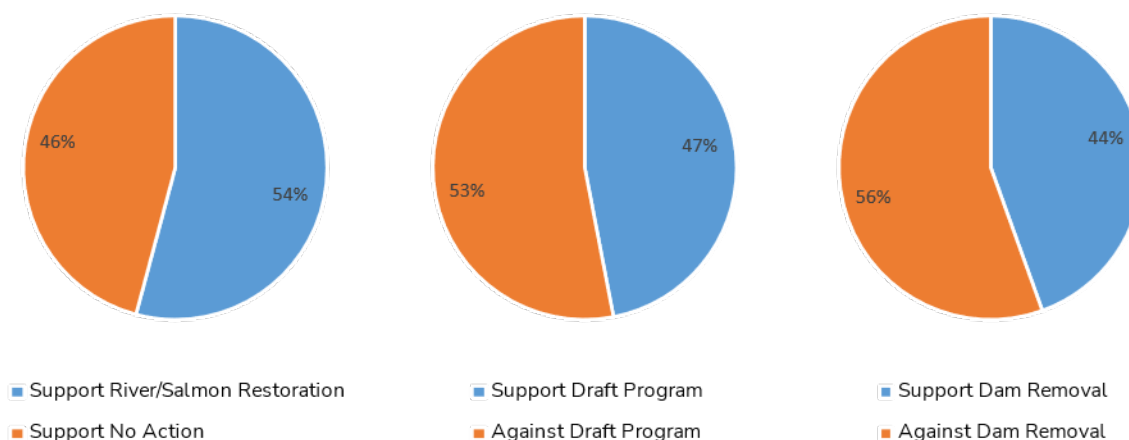


Figure 3-1. Percent of Individual Comments in each Category

The most individual comments received in any one category were comments against dam removal (136 total) followed by support for dam removal (109 comments) as shown in Figure 3-2 below. The number of comments supporting or against the Draft Program were 31 and 35, respectively, while the number of comments supporting or against general river/salmon restoration were 13 and 11, respectively.

Individual comments were analyzed separately than form letters. Because some of the form letters did not mention the Draft Program, it is possible that many commenters who submitted form letters were not aware of the details of the alternatives proposed in the Draft Program nor were they commenting directly on the Draft Program.

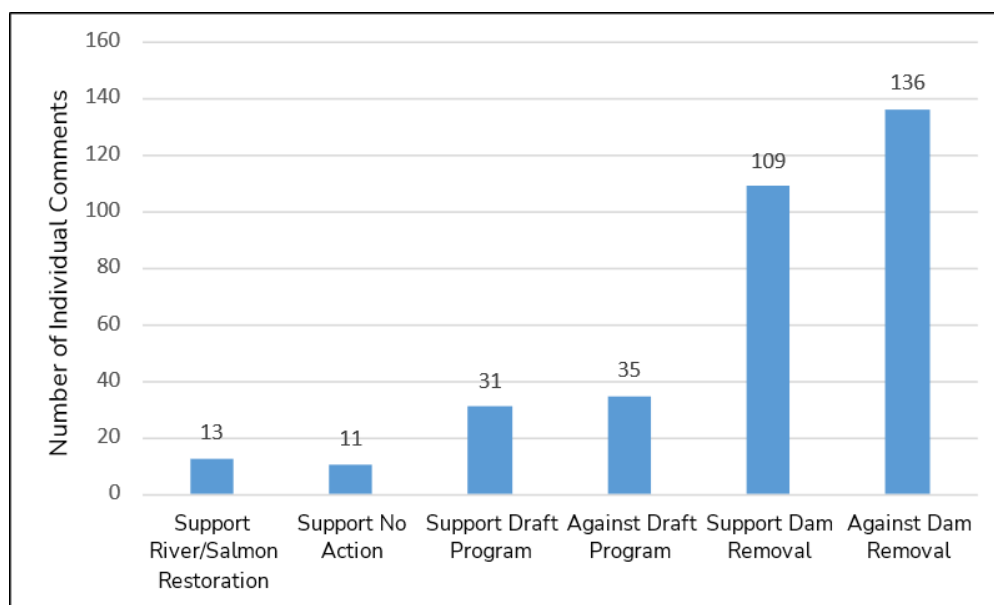


Figure 3-2. Number of Individual Comments in each Category

3.2 Form Letters

Most (60%) of the form letters received were from out of state (see Figure 3-3), while a third (33%) were from the combined CEA and MEA service area and 7% were from within Alaska but outside the Project service area.

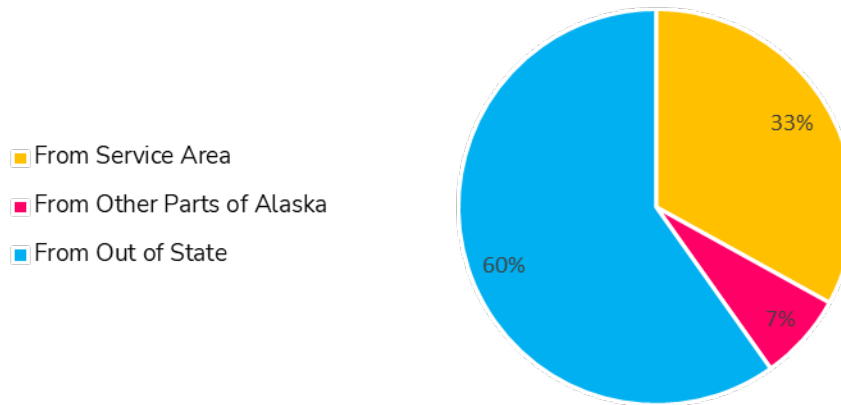


Figure 3-3. Percent of Form Letters from Inside the Service Area, Outside the Service Area, and Outside the State

A majority of the out-of-state form letters were the SalmonState version followed by Trout Unlimited. Overall, a majority of the Trout Unlimited and The Alaska Center form letters received were from the Project service area.

In total, 429 form letters were received from the Project service area, while 777 form letters were received from out of state and 93 were received from other parts of Alaska outside the service area.

Some of the form letters did not mention the Draft Program in any way, indicating that many of the commenters who submitted form letters may not have been aware of the Draft Program. This likely stems from the fact that the form letters were created in response to the dam removal campaign, and only discuss the removal of the Eklutna Dam.

Through responding to the commenters, it came to the attention of the Project Owners that The Alaska Center was submitting form letters on behalf of individuals by calling individuals and collecting their information over the phone and then submitting it through the form letter system. One such commenter responded to the info@eklutnahydro.com email address stating that she was confused by the phone call and wished for her comment and name to be removed from the record.

Additionally, Version 2 of the Trout Unlimited form letters states “*As ratepayers and residents of the area, we encourage you to move quickly to restore this important river*”. It is notable that several commenters that signed and submitted this form letter are neither ratepayers nor residents of the area, with 15 of 179 of these form letters from parts of Alaska outside the service area and 27 from out of state.

Figure 3-4 shows a timeline of when each form letter was received. Most form letters were received on Friday, January 19 and Friday, February 16. This is likely due to the fact that the public meetings were held the week prior to Friday, January 19 and the deadline to submit comments was February 19. In general, Fridays showed the highest influx of form letters when compared to other days of the week.

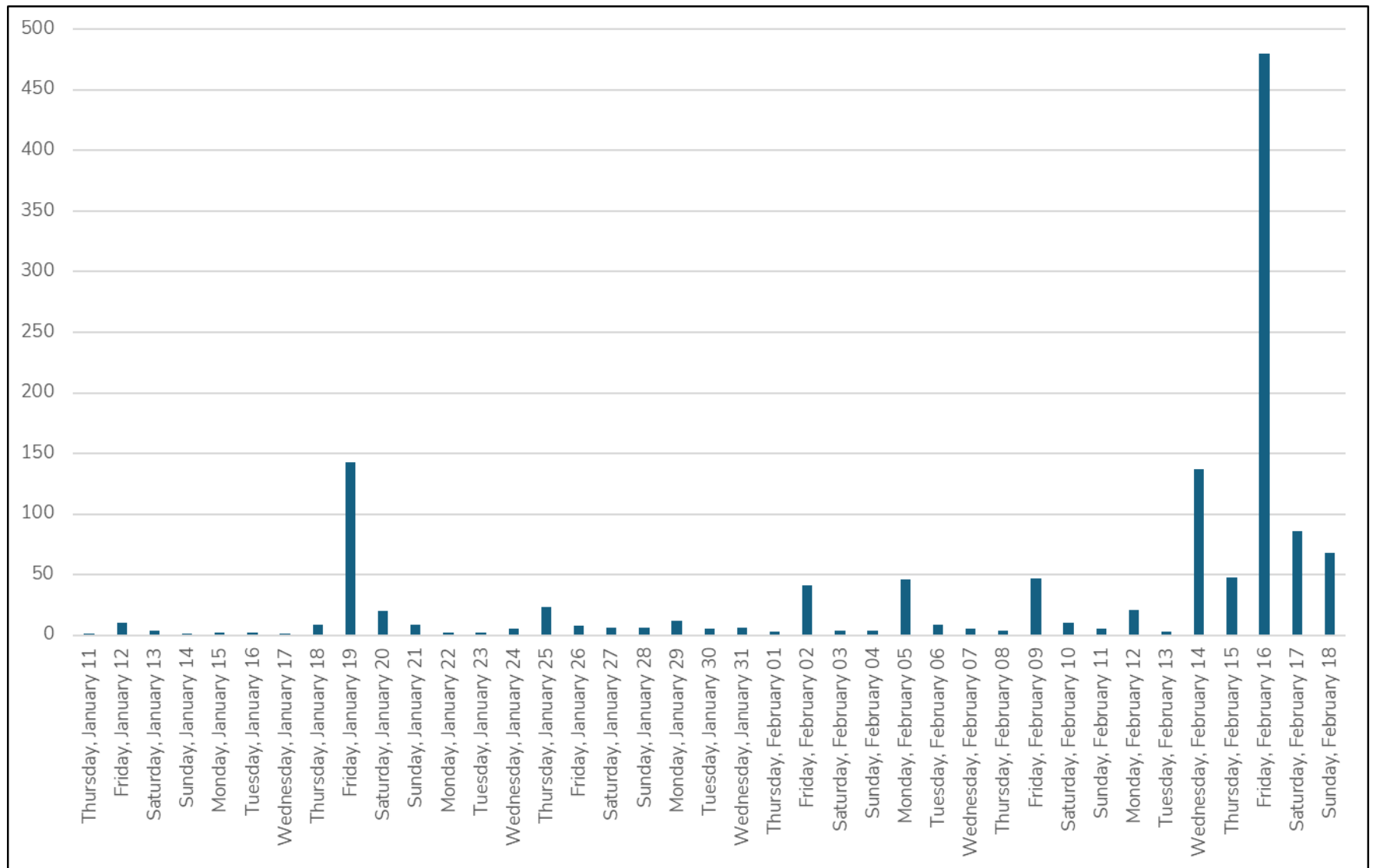


Figure 3-4: Timeline Showing when Form Letters were Received

4.0 Conclusion

Public comments were received by the Project Owners from October 27, 2023, to February 19, 2024. Both individual comments and form letters were received, with the individual comments analyzed separately from the form letters. Individual comments primarily addressed dam removal and the Draft Program, with comments supporting and opposing both dam removal and the Draft Program essentially evenly split. Several form letters from three organizations were received during the comment period; however, most of these form letters were from out of state. The form letters called for removal of Eklutna Dam.

Appendix A. Public Meeting Sign-in Sheets

This page intentionally left blank.

Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2:00

January 16, 2024, Palmer Depot

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Julian Ramirez	Anchorage	julianf.ramirez98@gmail.com	X		X	
Chenney Fife	ANC	chenney.fife@tv.org	✓		✓	
Tica Dury	ANC	martica.dury@tv.org	X		X	
Kurt Jansen	Palmer	KurtJansen60@hotmail.com		X		
Tom Harris	ANC	atomharris@gmail.com	X		X	
CURTIS McQueen	Valley			X		
Bob Doyle	Wasilla	rsbobdoyle@gmail.com		X		
Peter J. PROBASCO	Palmer	peproba@mtaonline.net		X		



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 16, 2024, Palmer Depot

2:00

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Bill Keating	Wasilla	billkeating@hotmail.com		✓		
Dann Beronimi	Palmer	Ya.sure@hotmail.com		✓		
Mark Johnson	Palmer	wj@mtaonline.net		✓		
Sam COTTEN	Bayview	52mc.er@aci.wt		✓		
Terry Drake	Chugiak	akscubaduck@yahoo.com akscubad		✓		
Andrea James	Wasilla	andjames06@gmail.com				
Rachel Muse	Anchorage		Board Member			
Helen Woodings	Palmer	hwoodings@gmail.com		✓		



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 16, 2024, Palmer Depot

2:00

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Sharon Weiss	Palmer	ncdrywel@mtaonline.net		X		
Brenda Hewitt	Meadowdale	brenda@hewitt.net		X		
Todd Smoldon	Willow	todd-smoldon@alaska.gov		X		
JOEL STEFANSKI	Palmer	utsalaska@gmail.com		X		
Robert Plunk	Palmer	Retired		X		
Robin M. Harms	LAZY mountain		X	X	X	
Jerry Vanecko	Palmer	Retired		X		
Michelle Beadle	Wasilla	michelle.beadle@tu.org				X



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 16, 2024, Palmer Depot

2:00

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Jim Stocker	Palmer	jstocker@mtaonline.net		✓		
Stephanie Freeman	Palmer	sufreeman@chidealean.mn.gov		✓		
MARK MASTERLIN	PALMER			✓		
Michael Rempel	Palmer			✓		
Jessica Winnestaffer	Palmer	jessdryden@hotmail.com		✓		
Kim Zello	Palmer	kfzello@yahoo.com		✓		
CorrieAnn Brophi	NVE/Big Lake	cbrophi@eklutna.org		✓		
Clyde Hock	Wasilla	clinemant@mtaonline.net		✓		



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 16, 2024, Palmer Depot

2:00

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Michelle Davis	Wasilla	tlngitwoman@gmail.com		✓		
JOHN HARRIS	WASILLA	JOHN.HARRIS.JR. @GMAIL		X		
Andrew Spohn	Palmer			X		
CHUCK KAUCIC	PALMER			✓		



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

January 16, 2024, Palmer Depot

6-8

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Brenda Hewitt	Meadow Lakes	brenda@hewitt.net		X		
Rain Wade	Wasilla	lewade@chickaloon-nsn.gov		✓		
Nicole Whittington	Palmer	shijor.north@gmail.com		✓		
Lisa Wade	Palmer	lwade@chickaloon-nsn.gov		✓		
Aylen Agnew	"	"		✓		
Rachel Christensen	Palmer	v.anne.christensen@gmail.com		X		
Chris Evans	Palmer	whiteren@entzonline.net		X		
TICA DRURY	ANC	murticajd@gmail.com	X		X	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

January 16, 2024, Palmer Depot

6:00

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Gabe Kitter	Wasilla	gabe.kitter@yahoo		✓		
Mark Matanuska	Palmer			✓		
Bernard Love	Palmer			✓		
Sandra Love	Palmer			✓		
Joe Hanson	Palmer			✗		
Susan Fleck	Anc.	zanfleek@gmail.com	✗			
Angeleen Wasky	Chugiak	wasky@yahoo.com		✗		
Alvin Sexton	Chugiak			✗		



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

6:00

January 16, 2024, Palmer Depot

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
KEN HUCKEBA	WASILLA	kbhuckeba@hotmail.com		✓		
Michelle Beadle	Wasilla	michelle.beadle@tu.org				x
Julian Ramirez	Anchorage	Julian.c.ramirez98@gmail.com	x		✓	
Michelle Dempsy	Palmer	Micdemps0312@gmail.com		✓		
Kelly Glasco	Anchorage	glasco.kelly@gmail.com			✓	
Chenney Fife	ANC	chenney.fife@tu.org	✓		✓	
Steve Faulkner	Palmer	BFeefer54321@gmail.com		✓		



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet 2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
SPAFFORD, MARK	ANC	mark.spafford@JACOBS.COM	Yes	N	Yes	☒



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Roger Morrison	Anch	rogermorr5228@gmail.com	✓			
Eric Booton	Anch	Eric.Booton@westernalum.org	✓		✓	
Rob Clark	Anchorage	1robclark@gmail.com	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Delmore Kinney	Anchorage	tr.p.kinney@hotmail.com	✓		✓	
Mark Wieg	Anchorage	markw@chugach.net	✓		✓	
Ryan McLaughlin	Anchorage	ryan.mclaughlin25@gmail.com	✓		✓	
Sanford Rabinovich	ANC	spreib@gmail.com	✓		✓	
Jenny Marie Struyker	ANC	jennymarie@akecenter.org	✓		✓	
JAMES ROSE	ANC	ROSE ALASKA @ GMAIL.COM	✓		✓	
JEREMY Hsieh	ANC	jhsieh@alaskapublic.org	✓		✓	
Daniel Powers	ANC	danieljpowers@gmail.com	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Russell Thornton TH Thornton	ANC	russell-thornton@chugach.org	X		X	
Sara Thomas + Michael + Sequoya	ANC	sara@axaction.org	✓		✓	
Chantal deAlvarez	AKC	c.dealvarez@gmail.com	✓			
Dave Syren	Anch	akflyer00@gmail.com	✓		✓	
Lauren Boldnick	ANC	~~lauren~~ boldnick.lauren@epa.gov				X
Chenney Fife	ANC	chenney.fife@tv.org	✓		✓	
Kyle Smith	ANC	ksmith@eklutnaic.com	✓	✓	✓	
Margo Mackile	ANC	margiekingeye.net	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
TICA DRVKY	ANC	matricajd@gmail.com	X		X	
Emily Cohen	Anc	emcohen@alaska.edu	✓			
Rick Whitebeck	ANC	rick@powerthefuture.com	X		X	
Brenda Heaton	Meadow Lakes			X		
Brynn Carey	ANC		✓			
GERI INAMA	ANC	inama.geriann@gmail.com	✓			
BRAD DEISH	ANC	deishbradley@gmail.com	✓			
M. J. Larsen	ANC		✓			



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
AUGUSTA REIMER	ANCH		✓			
D. OTUS	ANCH		✓		✓	
CURTIS J. McQueen	VALLEY			✓		
Crystal ENKVIST	Anchorage	CENKVIST@alaskapower.org	✓			
Gina Ondok	Anc		✓			
Rich Hrebin	Ach	Rich.Hrebin@gmail.com	✓			
FRED LARSON	ANCH	FCLARSON@MSU.EDU	✓		✓	
Austin Williams	Anc	austin.williams@tu.org	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Ton/Harr	ANC	atomharris@gmail.com	✓		✓	
Trish Baker	ANC	trishbakerat@gmail.com	✓			
Pixie Siebe	ANCH.	pixie@alaska.net	✓		✓	
M Bronson	ANCH	muddybottoms11c@gmail.com	✓		✓	
Ethan Tyler	ANC	etyler@civis.com	✓		✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Mark Spano	Anch	markspano55@gmail.com	✓		✓	
Charlie Peter	ANC	C Peter 1946@gmail.com	✓		✓	
Ragen Davey	ANC	Rag davey@gmail.com				
Mark Miner	Anch	mcrminer@yahoo.com	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

6:00

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Arthur Miller	MOA	arthur-miller@chugach.com	✓			
Sonya LaRose	MOA & Mat Su	aksonya@outlook.com	✓	✓	✓	
ARocklegat	MOA	ON file	✓		✓	
Kyle Shedd	Anchorage	kylershedd@gmail.com	✓		✓	
Carol Mahara	Eagle River	carol-mahara@fws.gov	✓		✓	
Ryan McLaughlin	Anchorage	rmclaughlin@akeenergyauthority.org	✓		✓	
Mandy Smith	Anchorage	smith.m2397@gmail.com				✓
Todd Lindley	Anchorage	todd.m.lindley@gmail.com	✓			



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

6pm

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Mark Henspeter	Anchorage	markhenspeter@gmail.com	✓			
Susan News	Anchorage	snews@gmail.com	✓			
Mark Parmelee	Anchorage	potterview@gmail.com	✓		✓	
Aubrey Palmer	Anchorage	aubreypalmer03@gmail.com				
Chang Ha	ANC	medha@pci.net			✓	
TICA DRURY	ANL	macticajd@gmail.com	✓		✓	
Aurora Roth	Anchorage	rothaurora@gmail.com	✓			
Rebecca Marks	Anchorage	rmarks245@gmail.com			✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 17, 2024, Arctic Rec Center, Anchorage

Copm

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Rick Whitbeck	ANC	rick@powerthefuture.com	✓		✓	
Lance Roberts	ETR	robertslance@gmail.com		✓	✓	
Glen Nielsen	ANC	prodlover967@gmail.com	✓		✓	
Ashlee Clarke	Eagler River	ash.clarke91@gmail.com		✓	✓	
Crane Johnson	ANC	crane@whitewinter.net	✓			
George Farnsworth	ANC	gffarnsworth@gmail.com	✓		✓	
Dan Morant	ANC	danrealstate@gmail.com	✓		✓	
A.M. Langvier		alangvier@gmail	✓		✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

6pm

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Stephanie Thompson	anch	ac1@gc1.net	✓		✓	
Robert Thompson	Anch.	theartsofAlaska@gmail.com	✓		✓	
Cheney Fie	ANC	cheney.fie@rc.org	✓		✓	
Jennifer Spegan	ANC	jennifer-j-spegan@fms.gov	✓		✓	
Erika Ammann ^{ANC}		ammannerika@gmail.com	✗		✗	
Julian Ramirez	Anc	julian@alcenter.org	✓		✓	
Chris Kellmann	ANC	Kayakdiver@gmail.com	✓		✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

6pm

January 17, 2024, Arctic Rec Center, Anchorage

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Brian Walsh	Anchorage	asbmw19@gmail.com	✓		✓	
Jenny DiGrappa	Anchorage	jmdigrappa@gmail.com	✓		✓	
Sarah Cronick	Anchorage	hearthtkyn@gmail.com	✓		✓	
Christopher Constant	Anch	christopher.constant@anchorage.ak.gov	✓		✓	
Austin Mahan	Anch	freezededanm@gmail.com	✓		✓	
Russell Andrews	Anch	russellandrews@gmail.com	✓		✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2:00

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Marglee Hayes	Eagle River			✓	✓	
Julian Ramirez	ANC	julian@akcenter.org	✗		✗	
Tom Prunty	Chugiak	tprunty@gmail.com		✓		
Charleene Shagren	Wasilla			✓		
David Hobbs	Chugiak			✓	✓	
Lila Hobbs	Anchorage		✓			
Carol Mahon	Eagle River	carol-mahon@afus.gov				
David Yesner	Chugiak	david.yesner@gmail.com		✓	✓	



Eklutna Draft Fish and Wildlife Program

Open House Sign-in Sheet

2:00

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Tom Harris	ANC	atan	✓		✓	
Kevin G. Jones	Chugiak	kevinupnorth@hotmail.com		✓	✓	
Brenda Horst	Mendocino	—		✓		
Robert Seitz	Chugiak	rseitzek@zol.com		✓		
Alan Kurczynski	Chugiak			✓		
Curtis McQuinn	Wasilla			✓		
David Zimmer	Palmer	dzim54@gmail.com		✓		
Scott Myers	Eagle River	scott@scottak.com		✓	✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Dany Hill	Palmer	Kamishak2014@gmail.com		☒		
Ethan Tyler	Anc	et Tyler@gisi.com	☒			
Bill Popp	ANC	bill@poppforAnchorage.com	☒		☒	
Monica Keim	Eagle River	monicarachellekeim@gmail.com		☒	☒	
Rick Sinnott	Chugiak	Sinfamak@gmail.com		☒	☒	
Lisa Sinnott	Chugiak	Sinfamak@gmail.com		☒	☒	
Jessica Ross	ANC/ Eklutna	jross2@alaska.edu			☒	
Nick Begich	Chugiak	nbegich@farshore.com		☒	☒	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2:00

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Kyle	Anch.	Kfoster@eklutnainc.com			✓	
MARK MASTELLER PALMER				✓		
LEWIS STEPHAN	sklutna			✓	✓	
GRACE SNOODGRASS	ER	grsnodgrass@gmail.com		✓		
Jamea Isham	Chugach					
Arthur D. Isham	Chugach	ishamarttam@gmail.com			✓	
DUSTIN LORAH	Anch	907realestate@gmail.com ✓			✓	
Ruth	Chugach	rstemour@gmail.com		✓		



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2pm

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Chenney Fire	ANC	Chenney@tv.org	✓		✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2pm

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
LEE Stephan	Eklutna Village	leanna@mtaonline.net				
Chris Hillmann	ANL	kayakdiver@gmail.com	✓		✓	
TICADRY	ANL	mactica.dry@fu.org	✓		✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

Gpm

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Brenda Hewitt	Meadow Lakes			X		
Austin Ahmasuk	Palmer	austinp@nativemovement.org				2
Lorraine Henry	Eagle River	lorrainehenry@gmail.com		X	X	
Teal Sky Heller	Eklutna/Eagle River	twbcrak@gmail.com		X	X	
Darin Hetschke	Eagle River	darin.hetschke@usda.gov		X		
Lynn Miller	Chugiak	lmiller8@gmail.com		X	X	
Ingrid Everson	Eagle River	ingrid.everson@hotmail.com		X		
Whitney Waskey	Eklutna Chugiak	whitneytw91@hotmail.com		X	X	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

6pm

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Amanda Adams	Chugiak	aadams84@gmail.com		☒		
Hailee						
Jason						
Alanna						
Noah						
Ella						
Paulette Ditzler	Eagle River	pnditzler@yahoo.com		☒	☒	
Denise Miller	ER	d.miller@gci.net		☒	☒	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

6:00

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Ken Everson	Eagle River	Keneverson@hotmail.com		X		
Bill Pritz	ER	—			X	
Stephen Romelle	ER				X	
Marykath Swenart ^{ken}	ER	mary-swenartan@Fusgov		X	X	
Julie Jensen	ER	JULIEJESSEN@gmail		X	X	
Marta Elena Odio McNatt	ER	bchoaretail@yahoo.com		X	X	
Michael McNatt	ER	mcnattak@gmail.com		X	X	
Chuck Homan II	ER	homaninc@mtaonline.net		X	X	



6pm

Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Chenney Fife	ANC	chenney.fife@tv.org	✓		✓	
Martica Drury	ANC	martica.drury@tv.org	✓		✓	
Marta Pitzler	ER	marta@akecenter.org			✓	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

6100

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Julian Ramirez	ANC	julian@akcenter.org	☒		☒	



Eklutna Draft Fish and Wildlife Program Open House Sign-in Sheet

2pm

January 18, 2024, The Workplace and Event Center, Eagle River

Name	Town of Residency	Email	Please check if applicable:			
			Chugach Electric Customer	Matanuska Electric Customer	Municipality of Anchorage taxpayer	None
Kyle Smith	Anc/ER	ksmith@eklutna.org	X	X	X	



Appendix B. Individual Public Comment Record

This page intentionally left blank.

B-1. Support No Action

This page intentionally left blank.

**BIRCHWOOD, ALASKA
BCCR No. 3**

**A RESOLUTION OF THE BIRCHWOOD COMMUNITY COUNCIL IN SUPPORT
OF EFFORTS TO RESTORE THE EKLUTNA RIVER.**

WHEREAS, the Eklutna River watershed has been in a badly degraded condition since 1929 due to hydro power dams and water diversions; and

WHEREAS, a principal impact from hydro power development in the Eklutna watershed is the loss of the Eklutna River's salmon runs; and

WHEREAS, the Eklutna River still supports five species of salmon, including Cook Inlet king salmon and sockeye salmon, though in greatly diminished numbers from historical levels; and

WHEREAS, Eklutna Incorporated, the village corporation for Eklutna, is the largest landowner in the Municipality of Anchorage and owns most of the land along the Eklutna River and around Eklutna Lake; and

WHEREAS, the Native Village of Eklutna and Eklutna Inc. have made substantial contributions to the development of the Municipality of Anchorage providing land for school sites, highways, railroads, power lines and rights-of-way; and

WHEREAS, The Native Village of Eklutna, Eklutna Inc., and The Conservation Fund collaborated on a \$7.5 million project to dismantle the Lower Eklutna River dam; and

WHEREAS, sediments accumulated behind the Lower Eklutna River Dam remain in the river channel due to low water flow conditions; and

WHEREAS, little to no water flows out of Eklutna Lake into the Eklutna River because of water diversions for the Eklutna Power Project; and

WHEREAS, restored in stream flow is necessary to flush the accumulated sediments downstream and allow for the recovery of salmon habitat; and

WHEREAS, stabilized lake levels and fish passage for upstream and downstream migrating salmon to and from Eklutna Lake would restore important spawning and rearing habitat for salmon; and

1 **WHEREAS**, the Municipality of Anchorage retains a majority interest (52%) in the
2 Eklutna Power Project; and

3
4 **WHEREAS**, the restoration of in stream flow to the Eklutna River and restored
5 fish passage to and from Eklutna Lake are the most desirable forms of
6 mitigation for impacts caused by the Eklutna Power Project; and

7
8 **WHEREAS**, an experimental three-week period of flushing flows in September
9 2021 allowed for some sediment transport and re-establishment of the river
10 channel, allowing for more meaningful study results and better mitigation design;
11 and

12
13 **WHEREAS**, the request for restored in stream flow in 2022 was denied by
14 the Eklutna Power Purchasers; and

15
16 **WHEREAS**, the Watershed and Natural Resources Advisory Commission of
17 the Municipality of Anchorage supported restoration of the Eklutna River
18 with the passage of Resolution WNRC 2019-03 titled "A Resolution Regarding
19 Restoration of the Eklutna River"; and

20
21 **WHEREAS**, the Alaska Federation of Natives (AFN) supported restoration of
22 the Eklutna River with passage of Resolution 20-17 "to restore traditional rivers
23 and

24
25 THE BIRCHWOOD COMMUNITY COUNCIL RESOLVES:

26
27 **Section 1.** The Birchwood Community Council recognizes that restoration of
28 the Eklutna River, including allowing salmon passage the length of the Eklutna
29 River, to and from Eklutna Lake, and into headwater tributaries, will benefit the
30 Native Village of Eklutna and residents of the Municipality of Anchorage and is
31 a priority of the Municipality in a manner consistent with the requirements of
32 the 1991 Agreement.

33
34 **Section 2.** The Birchwood Community Council supports the restoration of the
35 Eklutna watershed, including providing instream flow and fish passage the
36 length of the Eklutna River and into Eklutna Lake and requests that, Chugach
37 Electric Association, and Matanuska Electric Association commit as well.

38
39 **Section 3.** This resolution shall be effective upon passage and approval.

40
41 PASSED AND APPROVED by the Birchwood Community Council this 14th
42 day of December, 2022.

43
44
45 *Debbie Ossiander*
46 _____
46 Co-Chair Debbie Ossiander

47
48 *Matt Cruickshank*
49 _____
49 Co-Chair Matt Cruickshank

Eklutna Draft Fish and Wildlife Program

Comment Form *Chugach Electric Customer*

Name, Agency/Organization (optional): Email:

Gina Ondola

NVE Tribal Member, ET Shareholder, CIRI

Write your comments on the Draft Fish and Wildlife Program here:

The people of the Native Village of Eklutna have used Eklutna Lake for thousands of years. They hunted, fished, and harvested food off the land and Lake for all of those years.

Because of progress the Native people have had to adapt and give up their way of life.

Restoring the Eklutna River to enable spawning would also help restore a part of their way of life. This might help the Athabaskan people of the Native Village of Eklutna to feel that their voice matters.

Many Native people have moved to

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?

Over
↓



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Anchorage because of the high cost of village living. Subsistence fish from Eklutna River would bring them comfort.

When Eklutna people moved from Knik there was no Alaska Railroad, Glenn Hwy or Dam on the River. Their way of life changed dramatically because the Village was surrounded by the highway and railroad.

Asking that fish return to Eklutna River, to me, would prove that Native Village of Eklutna voice matters.

Place
Stamp
Here

Chugach Electric

Attn: Eklutna Project

P.O. Box 196300

Anchorage AK 99519

(Fold Here)

From: [sammy taylor](#)
To: [Sam Owen](#)
Subject: river mitigation
Date: Thursday, January 25, 2024 12:27:45 PM

Thanks for advertising these mitigation proposals for Eklutna dam. There are other ways to use water flow - in-river turbines or tidal generators - to produce electricity. Unlike dams, these methods have less effect of Fish migration and all the wealth that migration brings.

For the dake of future generations, please enact a program that does not impede Fish travel and spawning.

Thanks,
Sammy Taylor

From: caelmbrown@everyactioncustom.com on behalf of [Cael Brown](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Wednesday, February 7, 2024 10:27:28 PM

Dear Owners of The Eklutna Hydroelectric Project,

Fucks sake! restore the stream.

Sincerely,
Cael Brown
4113 Birch Ln Juneau, AK 99801-8909
caelmbrown@gmail.com

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [kendra mclean](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, February 14, 2024 9:41:06 PM

I support adding fish back into the river, but think having the hydro is still a needed benefit. Why cant there be proposed solutions to add a fish ladder or tunnels to allow them around the dam. past fish stories are numerous and will take a long time to recover, if it ever does. we have got to be able to have renewable energy without harming our food source.

Thank you for your time and efforts on matters that help us provide fresh fish to our table.

From: binamig@everyactioncustom.com on behalf of [Marla Sanders](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Wednesday, February 14, 2024 1:40:53 PM

Dear Owners of The Eklutna Hydroelectric Project,

Restoration of Eklutna water & fish ways is super duper important to everybody! Doing the right thing is not always easy. But it's always right.

Sincerely,
Marla Sanders
2570 Chandalar Dr Anchorage, AK 99504-3513
binamig@msn.com



February 15, 2024

Samantha Owen, Senior Regulatory Consultant
McMillen, Inc.
2607 Western Ave, Unit 360
Seattle, WA 98121

Submitted via email Owen@mcmillen.com

Re: National Tribal Water Council Letter of Support Regarding the Native Village of Eklutna's Resolution 2022-4: "Łiq'a nagh qinqtudeł - We are hopeful the salmon will return to us."

Dear Ms. Owen:

In 2008, the National Tribal Water Council (NTWC/Council) was formed by the U.S. Environmental Protection Agency (EPA) to provide EPA with technical input from Indian country, to strengthen EPA's coordination with Indian tribes, and to work with EPA to better understand issues and challenges faced by tribal governments and Alaska Native Villages as they relate to EPA water programs and initiatives. The NTWC provides tribes, tribal communities, and tribal organizations with research and information for decision-making regarding water issues and water-related concerns. Furthermore, the NTWC advocates for the best interests of federally-recognized Indian and Alaska Native tribes and tribally-authorized organizations in water-related matters. The NTWC advocates for the health and sustainability of clean and safe water, and the productive use of water for the health and well-being of Indian country. The NTWC takes its role seriously and has provided input to EPA on many water issues since the Council's inception.

Many of the environmentally related matters that impact tribal sovereignty and sustainability are important to discuss and ensures tribes' ability to ensure water-life ways are protected for generations and generations. One water-life ways concern has come to our attention by the Native Village of Eklutna relating to their longstanding efforts to restore salmon passage at the Eklutna Lake dam that would restore access to over two thirds of historic salmon habitat in the Eklutna River system.

The Eklutna River watershed is north of Anchorage and encompasses nearly 174 square miles. The Eklutna River is a tributary to the Knik Arm of Cook Inlet¹. Please see Figure 1. For nearly 95 years, sockeye salmon migration in the Eklutna River has been blocked as a result of two hydroelectric diversion dams. The first diversion dam, the Lower Eklutna Diversion Dam, was completed in 1929 and

diverted up to 500 cfs of the Eklutna River flow, which benefited the City of Anchorage's electrical need. Please see Figure 2. Since 1929 when the lower dam was completed, the majority of the Eklutna River's sockeye salmon spawning and rearing habitat has been blocked. Additionally, the river flow below the lower dam was greatly attenuated beginning in 1929. Chinook and Coho migration to the upper two thirds of their Eklutna habitat were also blocked.

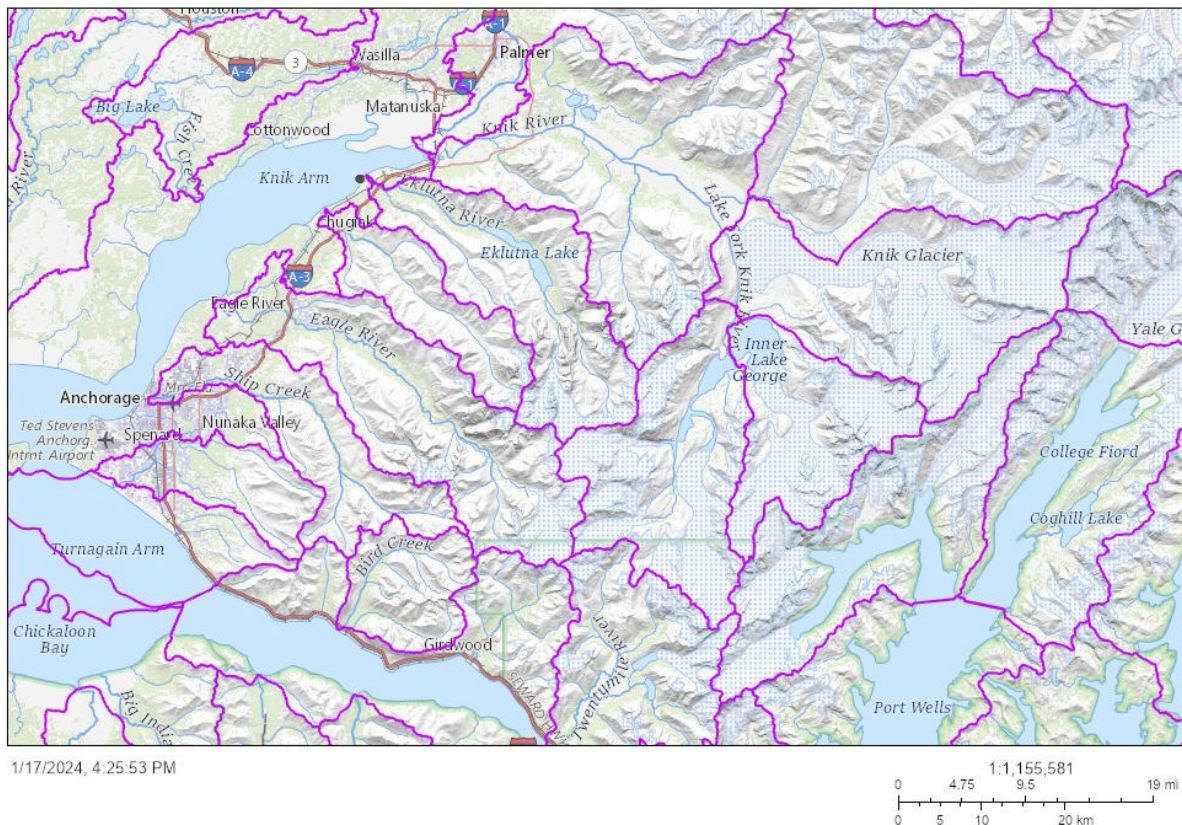


Figure 1. Map of watersheds in the vicinity of Anchorage, Alaska. The Eklutna River watershed is located near the upper center of this map and fully encloses Eklutna Lake, which along with the Eklutna River, are identified on the map. Source: EPA Waters GeoViewer 2.0 web mapping tool.

In 1955, the Eklutna Hydroelectric Project Diversion Dam, the upper dam, was completed considerably further up in the watershed at the outlet of Eklutna Lake, which was formed because of glacial moraine deposition that resulted in a natural dam across the valley² (see Figure 2). The upper dam has a considerably larger footprint than the lower dam, which was already blocking salmon migration and greatly diminishing river flow in the river reach below the location of the lower dam. In the nearly 70 years since 1955, most of the mean annual Eklutna River flow, which is estimated at 345 cfs using streamflow gaging data acquired at the Eklutna Lake outlet between 1947 to 1954¹, has been diverted from the river channel below the upper dam. Peak monthly flows of roughly 1,000 cfs occur in July and August¹. An estimated 90%¹ of water diverted at the upper dam flows into a 4.5-mile tunnel that conveys the water from the lake to a hydroelectric power plant located to the north, on the Knik River, which flows into the Knik Arm of Cook Inlet. The tunnel has a flow capacity of 640 cfs³. The power production at the project hydroelectric plant amounts to about 3% of the total power available from the grid, which encompasses Anchorage and outlying areas.

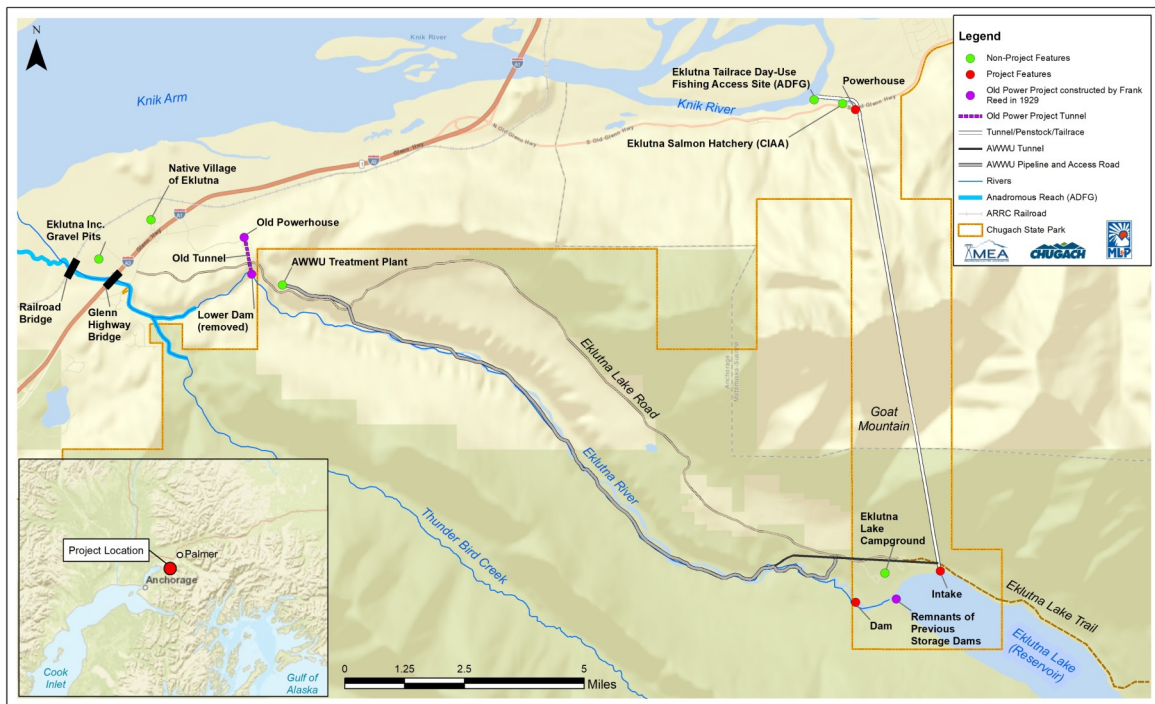


Figure 2. Detail map of the Eklutna River below Eklutna Lake with key dam, diversion, and hydroelectric power generation infrastructure. Source: https://eklutnahydro.com/wp-content/uploads/2019/07/Project_Features_NHD_Tunnel_07-03-2019.pdf

The remaining 10% of Eklutna River inflow to Lake Eklutna is diverted at the upper dam and conveyed via pipeline to the Municipality of Anchorage, supplying roughly 90% of the potable water supply for the Municipality of Anchorage¹.

Thus, since 1955, essentially no flow from Eklutna Lake has been allocated to the 14 miles of river below the Eklutna Hydroelectric River Project Diversion Dam. Note that there was a brief period of river flow during major facility reconstruction in 1965, necessitated by damage resulting from the 1964 Alaska earthquake¹. In addition, low-frequency, short-duration, high-magnitude flood flows on the Eklutna River are passed by the upper dam spillway when Eklutna Lake has insufficient capacity to store the floods. However, even if sockeye salmon could migrate up the Eklutna River to the top of the upper diversion dam, which is in principle possible after the 2018 removal of the lower dam, there has since 1955 in general been no continuous flow of sufficient magnitude and duration in the Eklutna River to sustain sockeye salmon migration, let alone spawning.

The nearly complete removal of sockeye salmon from the Eklutna River and its watershed has for nearly 95 years, deprived many tribal members and the natural wildlife of the salmon on which they interdepend.

Additionally, it is reported⁴ that:

The Eklutna River is a vital subsistence fishery that once supported thriving populations of all five North American Pacific salmon species. While each of these fishes remain present in the lower portions of the Eklutna River, and there are anecdotal reports of landlocked sockeye (kokanee) persisting in Eklutna Lake, today's populations are greatly reduced and limited in distribution.*

*Note: Since the above paragraph was written, reports of Kokanee in Eklutna Lake have been verified⁵.

With the above in mind, the National Tribal Water Council wrote this letter specifically in support of the Native Village of Eklutna's (Village of Eklutna/NVE) intention and efforts to accomplish in full the goals of their Eklutna River flow and sockeye, Chinook and Coho salmon restoration, as articulated in NVE Resolution 2022-4; "łiq'a nagh qinqtudeł - We are hopeful the salmon will return to us." A copy of the resolution is attached.

Subsistence traditions and practices are vital goals of the Eklutna River flow and sockeye salmon restoration. The restoration of sockeye salmon cannot occur without restoration of river flow. The following is an excerpt from the NVE's December 4, 2023, comment letter on the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program.

Our elders tell us that Eklutna (Idlughet) is an old, old village located by the Eklutna River, which was once an abundant salmon system. The Eklutna River (Idluytnu) has provided nutritional and cultural benefits to Eklutna Dena'ina throughout time immemorial, but hydroelectric dams have severely degraded its productivity. NVE has adopted a vision for fully restoring the Eklutna River for fish and wildlife habitat, traditional subsistence uses, and sustainable natural resource development from the top of the watershed to Cook Inlet.^a

NVE has broad support for this vision. Eklutna Inc. recently remarked that "[c]onnecting Eklutna Lake to Cook Inlet will benefit not just the adjacent landowner but our collective community," including all of Southcentral Alaska.^b The Alaska Federation of Natives, the largest statewide Native organization in Alaska, passed a resolution in 2020 proclaiming that "[AFN] supports efforts to restore traditional rivers and streams for fish and wildlife habitat, traditional subsistence uses, and sustainable natural resources development, and in particular, supports tribes like Native Village of Eklutna [...] to restore the Eklutna River for salmon habitat."^c

^a Native Village of Eklutna, "Our Vision for the Eklutna River" (accessed Jan. 15, 2024) <https://static1.squarespace.com/static/5f52cd19995bf84b22653379/t/642742b42454b574f1be304f/1680294580774/>.

^b Eklutna, Inc., Letter to Anchorage Assembly Re: Eklutna Draft Fish and Wildlife Program (Nov. 21, 2023).

^c Alaska Federation of Natives, Restoration of Traditional Salmon Habitat Resolution 20-7 (2020).

The key elements of NVE Resolution 2022-04 include:

1) Restoration of continuous flows in the Eklutna River below Eklutna Lake sufficient and necessary to support thriving sockeye salmon populations and their passage with intermittent higher

flows that will result in habitat maintenance and recreation opportunities along the Eklutna River between its confluence with the Knik Arm of Cook Inlet and the Eklutna River headwaters above Eklutna Lake; and

2) Management of Eklutna Lake level variability in a manner that facilitates and sustains sockeye spawning in the Eklutna River, from its confluence with the Knik Arm of Cook Inlet to its headwaters above Eklutna Lake. There are published reports of landlocked sockeye salmon living in the Eklutna Lake⁵. These very small, landlocked sockeye salmon are known as kokanee and are likely descendants of Eklutna River sockeye salmon that nearly 70 years ago were isolated in Eklutna Lake and headwaters above the lake, due to the construction and commissioning of the Eklutna Hydroelectric Project. Since they cannot go to the sea, their life cycle nutrition is compromised, and they never grow to mature size, though they do spawn and reproduce.

Given the above situation, brought about by the uncompromising placement of not one but two hydroelectric power and water supply dams on the Eklutna River, the Native Village of Eklutna and its inhabitants have worked since 2000 to restore flows and healthy salmon populations, including sockeye salmon migration and spawning to the Eklutna River.

Recommendations

The National Tribal Water Council (“Council”) commends the Village of Eklutna leaders, the Village members, and allied organizations for their efforts to restore Eklutna River flows and sockeye salmon.

The Council recommends that the owners of the Eklutna Hydroelectric Project, which consists of the Chugach Electric Association, Matanuska Electric Association, and the Municipality of Anchorage, work with the Village of Eklutna to craft an Eklutna Hydroelectric Project Fish and Wildlife Program that satisfies the Village’s objectives as articulated in the Village of Eklutna Resolution 2022 – 04.

Further, the Council encourages the hydroelectric project owners to work in good faith with the Eklutna Village leaders to manage Eklutna Lake levels and all aspects of the Eklutna Hydroelectric Project, and the Municipality of Anchorage water diversions, in a way that will sustain Eklutna River flows salmon habitat into the future. This will ensure traditional subsistence practices, together with cultural and traditional practices, that rely on Eklutna River flows and thriving salmon populations in the Eklutna River continue indefinitely into the future.

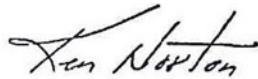
The Council notes that Alaska Natives have suffered a long history of voting rights suppression that continues into the present time (<https://www.azcentral.com/in-depth/news/politics/elections/2022/08/23/alaska-voting-rights-history/10238579002/>). Thus, it is probable that Alaska Natives in general, and Eklutna Village inhabitants in particular, had no role in decision-making related to the placement and operation of these dams, or the election of representatives responsible for the ultimate approval of such decisions. This history should be taken into consideration when facility owners, agencies, and government representatives negotiate with the Eklutna Village and tribal organization representatives, concerning flow and sockeye salmon restoration for the Eklutna River.

NTWC supports restoring salmon passage at the Eklutna Lake dam that would restore access to over two thirds of historic salmon habitat, by stream miles, in the Eklutna River system. We note findings of abundant potential sockeye spawning habitat around Eklutna Lake, contingent on restoring fish passage at the lake dam and maintaining sufficient lake levels. In addition, NVE habitat assessments found abundant Chinook and Coho habitat in the Eklutna Lake tributaries, which only await restored fish passage to facilitate restored runs. NTWC supports the release of sufficient flows from the lake to restore multiple channels and off-channel habitat for the full length of the Eklutna River below Eklutna Lake.

The installations of the Lower Eklutna Diversion Dam in 1929 and the Eklutna Hydroelectric Project Diversion Dam in 1955, predates the National Environmental Policy Act (1973) whereby all federal projects are required to ensure the review of a proposed project consider environmental impact statements, environmental assessments, and other systematic interdisciplinary considerations. Identifying endangered and threatened species of plants and animals should have been conducted, but these dams were built before environmental review, endangered/threatened species and environmental justice were required. There needs to be a good faith effort to consider the culture and lifeways of salmon on behalf of the Alaskan Native people. Further, there needs to be a good faith effort to address endangered/threatened species and to develop policies that address returning these areas to historic conditions for all species to thrive.

The NTWC appreciates the opportunity to support the Native Village of Eklutna's longstanding efforts in restoring salmon passage at the Eklutna Lake dam that would restore access to over two thirds of historic salmon habitat in the Eklutna River system. Should you have any questions regarding the letter, you may contact me at KenPNorton@gmail.com, or Elaine Wilson, NTWC Project Manager, at Elaine.Wilson@nau.edu.

Sincerely,

A handwritten signature in black ink that reads "Ken Norton". The signature is written in a cursive, flowing style.

Ken Norton, Chair
National Tribal Water Council

Cc: Holly Galavotti, EPA Office of Water
Marc Lamoreaux, Native Village of Eklutna

Attachment: Native Village of Eklutna Resolution 2022-04 (Addendum to Resolution 2019-11)

Footnotes

¹ McMillan Jacobs Associates, 2020, Eklutna Hydroelectric Project 1991 Fish & Wildlife Agreement Implementation FINAL Initial Information Package.

² Section 905(b) (WRDA 86) Analysis, Eklutna Watershed Study, Eklutna, Alaska

³ Eklutna Hydroelectric Project, Palmer, Alaska, Alaska Power Administration, 1999.

⁴ Eklutna River Workshop – Summary of Outcomes, Recommendations, and Future Needs, June 27-29, 2018. <https://www.tu.org/wp-content/uploads/2019/06/Eklutna-Workshop-Report-20181005-Final.pdf> accessed January 16, 2024.

⁵ Eklutna Hydroelectric Project Lake Aquatic Habitat and Fish Utilization Study – Draft Interim Report, Year 1, 2022. Accessed January 18, 2024. https://eklutnahydro.com/wp-content/uploads/2022/06/2022-2-11-Eklutna-Year-1-Interim-Report_Lake-Fish_DRAFT.pdf

References/Resources

<https://www.justice.gov/archive/enrd/ejguide.html>

https://www.doi.gov/sites/doi.gov/files/uploads/doi_ej_strategic_plan_final_nov2016.pdf

<https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmental-policy-act>

https://www.energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-DOE-greenbook.pdf



Office of Native American Initiatives

Northern Arizona University
PO Box 15004
Flagstaff, AZ 86011-5004
Elaine H. Wilson, NTWC Project
Manager

928-523-9555 office
928-523-1266 fax
nau.edu/itep
Elaine.Wilson@nau.edu
480-452-6774 cell



From: [Meadow Lakes Seniors INC.](#)
To: [Sam Owen](#)
Subject: Eklutna Hydro project comments due 2-19-24
Date: Thursday, February 15, 2024 2:10:35 PM

To: Those gathering comments on the Hydro Project,
I attended a Meadow Lakes Community Council meeting last night and left very concerned about the interpretation you will put on their comment. The vote was 11 to send a comment, 7 to not send a comment. The comment was only that the yes votes supported salmon fishing.

This kind of result can be miss-understood. Those in the room definitely wanted to preserve and restore the salmon fisheries. However, they also expressed concern about destroying the MEA power generation and the City of Anchorage water supply.

That is my comment – figure out a way to keep the power generation in place and the water supply for Anchorage intact. Do not tear these down. Maybe some type of fish ladder situation.

I feel the presentation was definitely one sided and did not present enough information for Council members to make a fair decision.

Thank you,
Sherri Rusher
6911 W Scatters Way
Wasilla, AK 99623

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Karen mannix](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 16, 2024 3:01:02 PM

I FEEL it is VERY important for the ecology of the RIVER to be fully restoRed to allow salmon to return to their natural spawning areas. While hydroeLectric power is also necessary, damning should not eradicate the natural Flow of the river and severely impact the anadromous quality of tge Eklutna River.

From: greg.streveler@everyactioncustom.com on behalf of [Greg Streveler](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 5:25:04 PM

Dear Owners of The Eklutna Hydroelectric Project,

I am a retired biologist and consultant with long experience in multidisciplinary, complex resource questions. It is rare in my experience that you are within grasp of rolling back an obvious ecological/social wrong of such major dimensions. There will always be appetite for satisfying human "needs", invariably by invoking "balance", an equation where the environment always have to retreat.

Don't we all see that we have come to a point where this has to stop; that when an opportunity like Eklutna comes along to actually tip things back toward nature, this must be done?

Despite the Governor's sentiments, our emphasis should not always be toward d"developing" Alaska; its golden characteristic is NOT that so much remains to exploit, its that there is so much intactness to cherish - in a world where intactness is vanishingly rare.

Please opt for fish, all species, in the Elkutna system - don't leave out sockeyes, whose prognosis in the region is good and bids well to make the lake highly productive for this particularly valuable species. This is not only correct on its face, it would also stand as a pivot point, where the boosterism Anchorage has perennially stood for was reversed in favor of the future.

Thank you.

Greg Streveler

Sincerely,

Greg Streveler

23 Spruce Ln Gustavus, AK 99826

greg.streveler@gmail.com



1210 N Kim Drive, Suite B, Meadow Lakes, Alaska 99623
Phone: 907-232-2845 - Email: info@mlccak.org - Website: www.mlccak.org

Program Development Team
c/o Steve Padula
Hydro Regulatory Services
Senior Advisor
info@eklutnahydro.com

February 19, 2024

RE: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

Dear Steve Padula and team:

The Meadow Lakes Community Council membership voted to support the pursuit of returning salmon to the Eklutna River. The Council membership voted to submit these comments at their February 14, 2024, meeting.

Sincerely,

Camden Yehle
President, Meadow Lakes Community Council

From: [Patricia Fisher](#)
To: [Sam Owen](#)
Subject: Eklutat river
Date: Monday, February 19, 2024 8:55:19 AM

I support returning the Eklutna river to a sustainable salmon river.

Patricia Fisher
psfisherak49@gmail.com
Resident Matanuska-Susitna Borough

B-2. Support General River/Salmon Restoration

This page intentionally left blank.

From: [Lucy Teitzel](#)
To: [Sam Owen](#)
Cc: [Mark Teitzel](#)
Subject: Opposed to any reduction in water for Eklutna hydroelectric power generation or Municipal Water Supply
Date: Tuesday, January 16, 2024 10:16:58 PM

To whom it may concern:

We are opposed to any reduction in water for Eklutna hydroelectric power generation or Municipal Water Supply for the following reasons:

1. The cost of electricity impacts the cost of virtually everything.
2. The cost of electricity is already extremely high in Southcentral Alaska.
3. The Eklutna hydroelectric power plant generates some of the lowest cost energy if not the lowest cost electric energy in Southcentral Alaska.
4. Reducing the amount of water to the Eklutna hydroelectric power generation will only increase the cost of electricity even more which will lead to higher costs for heat, lighting, refrigeration, goods and services, housing and other essentials which will lead to higher population out-migration, higher poverty, higher homelessness and higher taxes.
5. Creating a new fishery is a pipe-dream based upon the dismal salmon returns to the existing Little and Big Susitna River drainages which are unable to reach escapement goals even with sport fishing closures.
6. With the Eklutna River drainage being on mostly, if not all, private land, any fishery is doomed to create more conflict.
7. Reducing the amount of water for the Municipal Water Supply will only increase utility bills which will also lead to higher population out-migration, higher homelessness and higher taxes.

Mark and Lucy Teitzel

From: [Robert Yerkes](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 23, 2024 4:22:24 PM

CAUTION: This email was received from an external source

I hear that Anchorage gets 90% of its water from the eklutna lake. I also hear that there is a small amount of fish effected by the existing eklutna hydro water project. why in the world would we risk loosing the water source for the city of anchorage and also risk loosing the inexpensive electric power produced. I don't support any changes to the existing eklutna hydro Dam, period. Leave it as is except for efforts to enhance it current operations.

From: [Daniel Derr](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 30, 2024 4:22:44 PM

Leave the dam as is anchorage needs the water.

From: [Frank Muncy](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 12:33:56 PM

Please DO NOT take any action that would reduce electrical power, drinking water and access to recreation to tens of thousands of residents in South Central Alaska. We should be expanding these resources .
Thank You.

From: [Gary Brown](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna Hydroelectric Project Draft Fish and Wildlife Program
Date: Tuesday, February 6, 2024 12:21:57 PM

Do not take any action that will jeopardize diminishing or losing almost 90 percent of MOA's water supply. Also, do not take any action that will jeopardize, diminish, or eliminate the production of clean electricity that can provide power to some 24,000 home for an entire year, at the lowest cost of renewable energy in Southcentral Alaska.

The current use of Eklutna Lake is far more valuable and important than the uncertain potential of migrating salmon.

Sincerely,
Gary Brown

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

The Eklutna Dam should be left alone.
It is fiscally irresponsible to spend 40 million dollars
of hard-earned taxpayer money on something that
is working well. People need energy and water.
To spend forty million dollars minimum and get
10% less energy for a few fish is not a good
return on our money. It would be criminal to
be so reckless with our tax dollars. The Eklutna
Dam should be left alone.

Mark + Linda Spohn
P.O. Box 91
Willow, Alaska 99688

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [g r sNODGRASS](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, February 17, 2024 11:46:18 PM

aS A 40 YEAR EAGLE RIVER RESIDENT WHO HAS ENJOYED THE BEST WATER IN ALASKA, I HATE TO SEE THESE VARIOUS OPTIONS PUT WATER AVAILABLITY AT RISK. THE RISK COULD BE SUPPLY OR CONTAMINATION. ALL PROPOSALS WILL JEOPARIZE THE SUSTAINABLE pOWER GENERATION AT THE EKLUTNA HYDRO PLANT. ALL WILL COST ADDITIONAL DOLLARS FOR POWER. AT A TIME WHEN WE ARE NATURAL GAS CONSTRAINED THAT DOES NOT MAKE ANY SENSE. WE NEED OUR ELECTRIC POWER AND OUR GOOD DRINKING WATER. NOW EVERYONE WANTS TO MAKE THIS ABOUT SALMON RETURNING TO LAKE eKLUTNA. i AM SORRY BUT IF YOU LOOK AT THE COSTS OF THE VARIOUS OPTIONS, WE CAN BUY SALMON FROM cOPPER rIVER OR THE KENAI AND DELIVER IT TO THE RESIDENTS OF EKLUTNA FOR EVERY. IT MAKE SO SENSE TO REMOVE THE DAM FOR FISH TO DIE IN THE LAKE. i HOPE THE GOVERNOR IS SMART ENOUGH TO SEE THIS FOR WHAT IT IS. A BIG WASTE OF MONEY.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [dennis hansen](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, February 18, 2024 3:18:07 PM

Hello,

As a MULTI-GENERATION and lifelong Alaskan, thank you for the opportunity to provide input on the Eklutna Hydroelectric 1991 Fish & Wildlife Agreement study results and proposed project. I fully agree as stewards of the natural resources in this great land we need to wisely manage and use the resources provided to us. Reviewing the proposed alternatives and cost benefit analysis I do not see an alternative which provides benefits that justify the cost or scope proposed. The owner's alternative (as well as the others) does provide for year round flow in the Eklutna River for the spawning and rearing of Coho, Chinook, and Sockeye salmon. However, the alternative's analysis only provides information on the habitat gain's provided by the proposed project, not the anticipated size of the salmon run. The size of the run is an important metric as it will help decision makers and the public better determine the cost and benefit of the proposed alternative. Per study personnel the estimated salmon run achieved by these proposed alternatives is between 200 and 1,000 salmon per year. With a projected annual cost of \$2.8 Million this means the cost per salmon will range from \$14,000 to \$2,800 per salmon. In addition the small run will not be able to provide a sustainable food source. To ensure longevity of the run most salmon must be allowed to spawn and bag limits on the Eklutna river will be very small.

The final cost which does not have an offsetting benefit, is the reduced power production of the Eklutna hydroelectric plant. The Eklutna hydroelectric plant provides clean, reliable, low cost electricity to all railbelt customers. No major maintenance or end of life issues are present at the plant which would limit or reduce its capacity and longevity to provide clean, efficient power. As such, intentionally limiting the operation and reducing capacity of the Eklutna hydroelectric plant only results in inefficiency and reduced performance of the railbelt electrical generation system. This change impacts all railbelt customers and requires increased electrical generation using less efficient and clean power sources.

For the reasons listed above I request that the recommended solution of the 1991 Fish & Wildlife Agreement study to the Governor of Alaska be that the study finds the impacts of the Eklutna Hydroelectric plant have already been realized since construction in 1955 and no further impacts to the environment are imposed. Mitigations and enhancements are found to have an unfavorable cost to benefit ratio. Continued operation of the Eklutna hydroelectric plant, Eklutna dam, and AWWU water source is recommended to continue as is.

Respectfully,
Dennis H.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Eva Hansen](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, February 18, 2024 10:16:26 PM

Hello, dear fellow alaskans,

I URGE ALL OF YOU, WHO ARE CONSIDERING CAHNGEING THE EXISTING WAY THE EKLUTNA POWER PLANT OPERARATES, TO RECONSIDER.

IN AN AGE WHERE EVERYONE IS CALLING FOR CLEAN ENERGY, TO CONSIDER GETTING RID OF A WONDERFULLY WORKING POWER PLANT THAT SUPPLIES ABOUT 6% OF aNCHORAGE'S POWER NEEDS DOES NOT SEEM WISE.

tHE DRINKING WATER IS ALSO AN IMPORTANT FACTOR. AS WE ALL KNOW, WE HAVE HAD SEVERAL YEARS WHERE THE WATER LEVELS HAVE DROPPED CONSIDERABLY. wITH THE CHANGES THAT ARE PROPOSED IT COULD GET WORSE, WHEN WE GET MORE DRY SUMMERS. tHE NUMBER OF SALMON, THAT WOULD POTENTIALLY BE ABLE TO MAKE IT TO THE LAKE, AND REPRODUCE SEEMS VERY SMALL, IN THE COMPARISON TO THE COST OF THE PROPOSED PLANS. Per study personnel, the estimated salmon run achieved by these proposed alternatives, is between 200 and 1,000 salmon per year. With a projected annual cost of \$2.8 Million this means the cost per salmon will range from \$14,000 to \$2,800 per salmon. In addition the small run will not be able to provide a sustainable food source. To ensure longevity of the run most salmon must be allowed to spawn and bag limits on the Eklutna river will be very small.

This change impacts all railbelt customers and requires increased electrical generation using less efficient and clean power sources.

Mitigations and enhancements are found to have an unfavorable cost to benefit ratio. Continued operation of the Eklutna hydroelectric plant, Eklutna dam, and AWWU water source is recommended to continue as is.

tHANK YOU FOR CONSIDERING BEING WISE STUARTS OF OUR GREAT LAND AND RESOURCES.
eVA h

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [KENNETH C HANSEN](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 2:43:21 PM

Thank you for allowing our input. I am not intending to write in all Caps, this message box converts texts to all caps :-). I am support of keeping the eklutna power plant as is, with no change. Eklutna Hydroelectric project provided a reliable alternative source or low cost electricity which is essential to reduce the burden and cost of providing electricity to consumers who are already experiencing over whelming costs for energy along with all other necessities. We cannot afford a project that we will pay for. In every area of our lives, we are paying more and reducing resource availability. Right now we need simplicity and stability in our energy and lower costs. Considering that only 200 to 1000 salmon with return makes the argument that this project should not proceed.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Marvin Huske](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 11:30:04 PM

The dam should stay as it is. It is insane to remove the hydroelectric generation when we are faced with a natural gas shortage in the future .it would have to be made up by gas generating electricity turbines. How much power did the wind turbines on fire island generate when it was -20 earlier this year. not much i would bet. Enhance salmon somewhere else and leave eklutna river as it is.

B-3. Support Draft Program

This page intentionally left blank.

From: [Jeff Sperry](#)
To: [Sam Owen](#)
Subject: draft proposal
Date: Wednesday, January 10, 2024 8:18:29 PM

I support the current proposal for the eklutna hydro project. The renewal electricity that is produced is very low cost for the consumer in several communities and should be maintained.

No other electricity option is this cost effective.

This project also supports the important water source for the Municipality of Anchorage. It should be maintained.

Please move this proposal forward as it currently is.

Thank you

Jeff Sperry

Eagle River, Alaska

From: rabobdoyle@gmail.com
To: [Sam Owen](#)
Subject: Eklutna hydro
Date: Tuesday, January 16, 2024 4:22:59 PM

I support the draft proposal balancing the needs for water in Anchorage, renewable firm power generation for Mat-Su and Anchorage, and new salmon enhancement for Eklutna village.

Bob Doyle
1900 E Porcupine Trail
Wasilla Ak 99654

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Josh Hanson

JH/ALASKA1@gmail.com

Write your comments on the Draft Fish and Wildlife Program here:

THE OWNERS PURPOSE OF SPENDING THE 44 M\$ SEEMS
ADEQUATE IF NOT EXCESSIVE. KEEPING RATES LOW FOR MEMBERS
SHOULD BE THE TOP PRIORITY ~~WASTE~~ THEN THE FISH CAN
BE A SECONDARY PRIORITY. THERE PLAN TO SET UP A
COMMITTEE TO HELP MITIGATE RISKS TO SALMON AND EVEN FUND
THAT COMMITTEE SEEMS RATHER GENEROUS AND SHOULD HELP TO
MITIGATE THE ISSUES OF THE PEOPLE ON THE COMMITTEE.
PLEASE FOCUS ON THESE SWITCH ON/OFF HARD RESOURCES LIKE
THE EKLUTNA DAM. RENEWABLES ARE CUTE AND SHOULD BE
PURSUED ONLY IF DONE SO CRITICALLY AND WITH PROVEN
ENERGY PROVIDERS HERE TO BACK THEM UP.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

This was a very well thought out and well presented proposal. Thank you for all your hard work!

It seems through this will be a win-win for everyone. We get to keep a sustainable source of power and water and it cleans up a stretch of River that will provide a home for the fish. It will cost a bit, but I think in the end it will be worth it.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional):

William Owen

Email:

WILLOWENTY747@GMAIL.COM

Write your comments on the Draft Fish and Wildlife Program here:

I THINK THE OWNERS AND THEIR PARTNERS
HAVE GONE TO EXTRAORDINARY LENGTHS TO REACH
COMPROMISE SOLUTIONS ON AS MANY OF THE
THINGS IN QUESTION. IN THE END A SOLUTION THAT
MEETS THE NEEDS AND DESIRES OF AS MANY
AS POSSIBLE. ALL PARTIES CAN GET SOME OF
WHAT THEY WANT, EVERYONE MUST ~~BE~~ COMPROMISE.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [Randy J Moore](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 18, 2024 11:29:59 PM

CAUTION: This email was received from an external source

I have been following the discussion regarding the plans for the future of the dam and related recreation. I urge the governor to move forward with LEAVING the dam in place PROVIDING cheap, reliable energy . Upgrade the recreation areas and try and allow the native community to develop fishing techniques and alternatives for subsistence.

Randy moore
4640 Southpark bluff drive
Anchorage, Alaska 99516

From: [Owen, Samantha](#)
To: ["Charles Peter"](#)
Subject: RE: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 1:48:00 PM

Hi Charlie,

Thank you for your comment. It has been added to the record and will be taken into consideration by the Project Owners.

That's a great question. We actually did look into this kind of "hybrid" alternative (proposed by The Conservation Fund during the fourth alternatives analysis meeting and discussed during the fifth alternatives analysis meeting). The problem is timing. The salmon start migrating upstream in June when the reservoir is usually still very low. Which means that in order to release water at the dam through a fish ladder in June, we would need to keep the reservoir high through the winter by not generating any power for about 7 months, just like if we were releasing water from the dam year-round.

Hope that helps, and thanks again.

Samantha Owen
Senior Regulatory Consultant

owen@mcmillen.com
C: (305) 409-5201 | O: (206) 743-9251
2607 Western Ave, Unit 360, Seattle, WA 98121
mcmillencorp.com

-----Original Message-----

From: Charles Peter <mail@eklutnahydro.com>
Sent: Friday, January 19, 2024 12:11 PM
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US

CAUTION: This email was received from an external source

Thank you for the Jan 17 meeting. It was very informative. The utility plan seems to be a good one. My main concerns were our great water supply and green power generation. Would it be possible to install a passage around the dam with a water gate that could be opened as much as needed during the fish run to the lake and again when the smouts go out of the lake ? We may lose a little green power during two say 30 day periods. CHARLIE PETER

From: [Aidan Blum](#)
To: [Sam Owen](#)
Subject: Public Comment: Eklutna Hydro Mitigation Project
Date: Wednesday, January 24, 2024 1:14:35 PM

To whom it may concern,

I am writing to express my support to the Eklutna Hydro Project proposed mitigation efforts to allow great salmon spawning on the Eklutna River. I know there are many challenges associated with the equitable use of this resource; however, I believe the proposed path forward is the best to allow for the most wide cast use of the Eklutna River. As a resident of Anchorage, the drinking water and power the Eklutna Reservoir provides is vital to a continued sustainable life in South Central Alaska. Please have my greatest thanks for the hard work of the project team on developing this mitigation plan.

Thanks,

Aidan I. Blum (He/Him)
Anchorage, AK

Email: blum.aidan@gmail.com

From: [George Snodgrass](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 26, 2024 4:28:32 PM

I recommend the governor adopt the recommended option put forth in the Eklutna Fish and Wildlife program.

i attendeD THE PRESENTATION ON JAN. 18 IN EAGLE rIVER ON THE EVALUATION OF THE eKLUTNA HYDRO FISH AND WILDLIFE PROGRAM. tHE PRESENTATION ON THE ALTERNATIVES AND THEIR ASSOCIATED COSTS WAS WELL DONE AND EASY TO UNDERSTAND. aS A BIOLOGIST AND AND ENGINEER HAVING BEEN INVOLVED WITH ENVIRONMENTAL IMPACT STUDIES (eis) AND ENVIRONMENTAL ASSESSMENTS (EA) on the north slope and in cook inlet, i was impressed with the depth and breathe of the studies conducted over five years for the project. I also thought the efforts by the power associations to include the signatories to the 1991 agreement and the native village of eklutna was well done.

If we read the Anchorage daily news, we would be led to believe it was only about removing the earthin dam. They want to make this the politics of salmon. Some believe they can have salmon in eklutna lake just like the kenai lake. wrong. it is not just about that. not just a single solution. it is a well thought out engineering and biological solution.

The idea of turning the lenght of the eklutna river into viable spawning and rearing habitat by controlling the flow of water in the river year round is brilliant. The detractors to the preferred option complain about the one mile of the river that will not have controled water flow but that is of little consequence in the overall benefit scheme. removing the dam make the river a wild uninhabitable location for fish through the summer months. Not a good idea. It will also damage the water intake piping to the water treatment plant by scouring the pipe that cross under the river. Additionally, the large water flows in summer months will damage the bridges crossing the river. Removing the Dam is a damn bad idea.

lastly, it is important to understand that the eklutna lake is not good salmon habitat. The lake is glacier fed and brings consideral silt into the lake. The silt covers the gravels good for attaching the salmon eggs and rearing young fish. The several fish species in the lake today are undersized and malnurished due to the silt. creating and expectation that removal of the dam will allow sockey salmon to be raised in the lake is bad science.

We need to continue to have the cheapest and most reliable power in southcentral AK. we cannot put our families and communities at risk over the politics of salmon. Please support the comprehensive proposal by the power companies and their experts on the eklutna fish and wildlife program.

From: [LYNN M MILLER](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 26, 2024 9:46:46 AM

I am IN favor of the plan as submitted for public review.

I attended a public information session and had ample opportunity to ask questions of the principal researchers.

This project has more impact on anchorage's water source than it does as a power source.

I noted that there were no firm commitments by trout unlimited and other associated groups to contribute to the maintenance/repair of the water pipeline should the free-running river damage the line.

I do strongly agree that other more eco-friendly sources of energy are needed and should be developed. However, I give protecting MOA's source of potable water a higher priority than a restored streambed.

"A good compromise leaves everyone unhappy", this plan has succeeded.

From: [Andrew](#)
To: [Sam Owen](#)
Subject: Public comment
Date: Saturday, January 27, 2024 3:26:49 PM

To whom it may concern,

I am writing in support of the clean energy produced by the Eklutna Hydroelectric Project. It is my understanding that this is some of the most inexpensive and cleanest energy produced in South-central Alaska. As a member of the MEA and a Palmer resident I would like to see the project continue to produce as much electricity as possible. This is an energy resource that is shared and used by residents throughout south-central and is a benefit to all residents who use electricity.

From attendance at the Palmer informational meeting it sounds like the “portal” option may be a good option. I support any option that continues to produce energy at the current rate or is an improvement on the current energy production without incurring additional costs to the utilities or their members.

Sincerely,
Andrew Spohn
Palmer, Resident

From: [Charles Homan II](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 27, 2024 8:48:16 PM

I support the Project Owners plan to continue to use the Eklutna Hydroelectric power plant. Currently there are very few alternatives to replace this power source. Natural gas, the area's primary source to produce power is currently in decline in Cook Inlet. Matanauska Electric Association proposed building a coal-fired power plant and the community rejected it. The use of solar and wind during the cold Alaskan winters is an unreliable source of power. Until a safe, clean and abundant source of power is available the dam needs to be left in place.

From: [G Schumacher](#)
To: [Sam Owen](#)
Subject: Eklutna draft fish and wildlife
Date: Saturday, January 27, 2024 3:22:05 AM

Hi! I'm an anchorage resident that has spent some time at Eklutna, and benefits, like everyone, from hydroelectric power in Alaska!

I read the draft for restoring the Eklutna river while maintaining production capacity of Eklutna Hydro, and really support that initiative. I think it sounds really smart to redevelop that salmon habitat, and I appreciate the desire to keep effective green energy production.

My only hope is that one day the salmon habitat can extend all the way into Eklutna lake while maintaining electricity production, but I understand the limitations. Thanks for doing this!

Thanks,
Gus Schumacher

From: [Skyler Gallien](#)
To: [Sam Owen](#)
Subject: Public comment
Date: Saturday, January 27, 2024 4:32:02 PM

I am against the removal of the dam, for many reasons. The threat to Anchorage water supply, the infrastructure of the Glen Highway and the bridges over the Knik. My main concern is the loss of the cheapest and most reliable source of electricity for the railbelt, with the possibility of a natural gas shortage looming and general expense and lack of reliability of other forms of renewable energy sources not being anywhere close to that provided by the dam. I am concerned about steeply rising costs of electricity and its availability in general. I am a lifelong Alaskan and an avid outdoorsman, I love salmon and all that they provide for our communities. I consider myself a conservationist and have been excited to see the progress made so far on the Eklutna river but I believe that the plan presented for restoring a majority of the river without the removal of the dam to be the best option. If you have any questions about my opinions please feel free to contact me.

Skyler Gallien
9073221566
1125 East Donna Circle
Wasilla AK 99654

From: [Ryan Hook](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 28, 2024 6:12:28 PM

I do not agree with removing the dam, but am 100% for any efforts to mitigate the risk to fish and wildlife.

getting rid of some of the lowest cost electricity is not wise.

Cook inlet is running out of natural gas without any replacement in sight, thus putting more use on natural gas, a fossil fuel.

multiple natural gas rigs are currently broken thus stressing the system.

Alaska needs diversified power generation, hydroelectric should continue to be apart of that.

From: [Donna Kime](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 30, 2024 5:06:07 PM

I live in Anchorage. I understand that the Eklutna Dam PROVIDES 90% of Anchorage's drinking water and also provides electricity to Anchorage. I understand that Chugach Electric has proposed an alternative Plan on how to provide water to the Eklutna River for returning salmon and to also keep drinking water flowing to Anchorage. Stick with Chugach Electric's plan. Keep the dam working. Do not tear it down.

From:
To: [Sam Owen](#)
Subject: SUPPORT AWWU PLAN
Date: Friday, February 2, 2024 10:00:19 AM

If we must do something then please support the AWWU Plan.

Thank you for this consideration.

Please do not post my name associated with this comment on the website.

From: [Ruth St.Amour](#)
To: [Sam Owen](#)
Subject: Comment on Draft Fish and Wildlife Program
Date: Friday, February 2, 2024 2:43:25 PM

I attended the January 18 public meeting, read the 1991 Agreement, and reviewed the documents at eklutnahydro.com.

My focus is on the requirement of the 1991 Agreement ". . . to ensure that Eklutna and Snettisham are best adapted for power generation and other public uses . . ." The greatest public benefit is for continued power generation and water supply, which benefit all residents of the area. Affordable and reliable utilities are essential to the local economy and quality of life. Although some people are calling for the restoration of sockeye, "the protection, mitigation of damage to, and enhancement of fish and wildlife (including related spawning grounds and habitat)" is just one of eight purposes to be given equal consideration in the Fish and Wildlife Program.

The project owners' proposed program both improves the utility infrastructure and enhances fish habitat at a reasonable cost. As both an MEA customer and an Anchorage taxpayer, I care about project cost. It is easy for those who are neither ratepayers nor taxpayers to propose idealized projects at no cost to themselves.

I believe the owners' proposal fully meets the requirements of the 1991 Agreement, and encourage Governor Dunleavy to approve it.

Ruth St. Amour

From: [Mark Parmelee](#)
To: [Sam Owen](#)
Subject: Request to support the 2023 Eklutna Draft Fish and Wildlife Program
Date: Saturday, February 3, 2024 9:25:26 AM

February 3, 2024

Governor Dunleavy
c/o Samantha Owen
McMillen Jacobs
info@eklutnahydro.com

Dear Honorable Governor Dunleavy,

Please support the October 27, 2023 Eklutna Draft Fish and Wildlife Program (Draft). It will benefit all parties and is a good compromise that supports the 1991 agreement, red salmon, the Anchorage water supply and hydroelectric power.

The 1991 Agreement requires a Final Fish and Wildlife Program be issued by the Governor by October 2, 2024. The work to date has thoroughly studied the issues and produced a Draft you can sign as Governor. The Draft is well supported with documents, studies and agency reviews. I have reviewed the materials on the eklutnahydro.com website. I attended the Eklutna Hydro Public Meeting on January 17th and listened to and asked many questions of the technical experts. I support the Draft, a release of water from a new Eklutna River Release Facility, and to not remove the Eklutna Dam.

Removing the dam will not guarantee red salmon will travel past the old dam site and rear in the then river accessible Eklutna Lake. I have seen several places in Prince William Sound where post 1964 earthquake fish improvements have failed to reestablish red salmon runs. The Draft supports releasing 40 cfs of water in the summer to assist silver and king salmon. This additional water released from Eklutna Lake combined with Thunderbird Creek water will improve habitat for silver and king salmon as shown scientifically. Supporting salmon habitat is good. Removing the dam with the hope of red salmon rearing is not worth the loss of the dam's attributes.

Anchorage's water supply is crucially dependent on Eklutna Lake supplying the bulk of Anchorage's drinking water. Removal of the Eklutna Dam will allow uncontrolled flood events which may be detrimental to the water supply pipe. A lower Eklutna Lake water level puts the Anchorage water supply at risk.

Hydroelectric power is a valuable, reliable and affordable form of renewable energy. It is not dependent on the wind blowing or the sun shining. We can protect our energy security by continuing to use the Eklutna hydroelectric plant. Removing the dam will eliminate a nonpolluting source of power and is the wrong thing to do as Alaska is suffering from high energy prices.

The 1991 Agreement calls for periodic analysis (every 25 years) of the Eklutna hydroelectric developments on fish and wildlife. In the year 2049 let the analysis be done again for fish and wildlife. The Draft you have for your approval is a good compromise. The Draft will improve fish habitat, maintain Anchorage's water supply and provide reliable energy for Alaska.

Sincerely,

Mark Parmelee

Anchorage Resident Since 1985

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Brad Chastain](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, February 14, 2024 10:12:27 AM

I am a resident of Anchorage, a property owner, and a business owner. I strongly support full compliance with the 1991 Fish & Wildlife agreement for Eklutna Dam and strongly feel the Owners has completed fully sufficient studies and analysis of alternatives. The Owners' alternative to install a portal valve is reasonable and represents the best option for mitigating stream flow while balancing the need to maintain a VIABLE drinking water source and provide low cost and clean electricity for our community. The 1991 Agreement never contemplated removal of the dam and this arbitrary demand is being pushed by the activist industrial complex that generally opposes all human activity across the U.S. I urge you to complete the process in compliance with the 1991 Fish & Wildlife Agreement and not deviate from the timeline contained therein.

From: [Sue Petersen](#)
To: [Sam Owen](#)
Subject: Dam
Date: Thursday, February 15, 2024 11:17:58 PM

I do not believe that removing this dam is a good idea. We get so much electricity currently!! It's good, clean energy. There would not be enough salmon to make a difference. It would be a huge waste of time and money. Chugach can bring some water back a mile down stream. Sounds like a good compromise to me.
Please don't take the dam out!

Sue Petersen
Daniel Choate
Eagle River, Ak 99577

Sent from my iPhone

From: [Misty Ott](#)
To: [Sam Owen](#)
Subject: Eklutna Hydro Public Comment
Date: Thursday, February 15, 2024 12:54:02 PM

I appreciate efforts to minimize affects on the environment including sustaining marine species like salmon. I believe the Owners' plan is sufficient to meet their agreement obligations to do this without unacceptable major production losses or cost impacts to a necessary source of renewable energy and the main water supply to a significant portion of the state's residents. Removing the dam and spending hundreds of millions of dollars will not guarantee salmon will return to an area they may have frequented for more than 100 years ago, especially considering how salmon populations throughout the Pacific Ocean and anadromous waters are currently depleted.

Misty Ott

From: [Daniel Smith](#)
To: [Sam Owen](#)
Subject: comment on Draft Fish and Wildlife Program for the Eklutna Hydroelectric Project
Date: Saturday, February 17, 2024 11:55:16 AM

Hello,

I am in support of any solution or infrastructure build out that would minimize impacts to the existing electric generation and water supply for Anchorage.

my reasoning is that for close to 100 years (i.e. multiple human generations) the location has been adapted to act as a minor recreation site as well as function as a core piece of infrastructure for roughly 40% of the state.

More importantly, that major 40% of the state is also facing a looming energy crisis with natural gas shortages on the near horizon. The main solutions to that crisis have been a push for renewable energy; which eklutna hydro is. To remove a major source of reliable, clean energy in the face of a natural gas shortage would be economically, environmentally, and logistically irresponsible.

Thank you,

Dan Smith



Virus-free. www.avast.com

From: [Gary Saunders](#)
To: [Sam Owen](#)
Subject: No to dam removal
Date: Saturday, February 17, 2024 10:51:27 AM
Attachments: [alaskars-logo-vertical\(withstroke\)-125x64_d13f067c-dfa8-49ee-96d1-c3fd2e68adcf.png](#)
[036_sm_fb_a1347472-45be-4a0b-af83-b901fa688c57.png](#)
[036_sm_in_468e365e-e301-4c97-a0b4-805cb9a8926e.png](#)

I believe the Eklutna Dam is a valuable source of green energy, sustainable energy and common sense energy.

To destroy one of the primary sources of drinking water seems fool hardy.

I have seen no hard evidence that a “Kenai River salmon flow “ would be achieved.

Penalizing a large population for a small population seems poorly thought out.

Use the proposed mitigation programs and go from there.

Gary Saunders



Gary Saunders
Senior Sales Manager, Anchorage

M: 907.312.6675 | T: 907.276.7044
garys@ars-ak.com - alaskarestaurantsupply.com
2511 Eagle Street, Anchorage, Alaska 99503



From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Sharon hook](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, February 17, 2024 7:04:35 PM

Please don't do It!

tearing down an ENTIRE dam for approximately 2,000 salmon for subsistence in Eleven (11) miles of the Eklutna river is not based on common sense. First, restoration is not part of this project. Second, will the fish go up the river? Know one seems to know. \\\\"Fish will do what fish will do\\\\" is the answer I keep hearing. Thirdly, have any studies been done since the lower dam was torn down? Finally, at what cost?

Next consider water and energy for the Anchorage area. Ten (10) percent of our water comes from the dam. I heard the replacement from renewable resources would take approximately ten (10) plus years to obtain our current level. and that still leaves no room for future GROWTH; FOR Anchorage, the mat-su area which will affect the entire state. If the dam is torn down there will be no water pressure in the fire hydrants from eklutna to eagle river. in a hot dry summer everyone worries about a out-of-control devastating forest fire. this would be a perfect opportunity. As to providing energy for the area, what emergency plans are in place when the temperatures dip into the negatives for days at a time which recently happened? does anyone really want to make those DECISIONS BECAUSE renewables are not available.

What costs are involed with this project? The TAXPAYERS will see huge increases in the tax bills and energy bills. What will be the cost or REPLACING THE infrastructures to the taxpayer and the state? I, also heard, discussion on building a new dam. Millions more dollars for tearing down a perfectly good dam. What are all the unforeseen costs? Costs never go down.

Please follow the eight (8) directives that are address and leave the dam in place. My common sense says this is ridiculous and maybe 35 years from now there will be an entirely different energy source besides windmills and solar panels. Hydro electric is a clean and reliable sourece.

Thank you for allowing my voice to be heard concerning this project.

From: [Tim Swezey](#)
To: [Sam Owen](#)
Cc: president@mlccak.org
Subject: Eklutna Hydroelectric Project: Draft Fish and Wildlife Program
Date: Sunday, February 18, 2024 2:25:24 PM

RE Alaska's Constitution Requires a Balanced Solution
Ref# Eklutna Hydroelectric Project: Draft Fish and Wildlife Program

To all concerned,

I support the solution outlined in Eklutna Hydroelectric Project - Draft Fish and Wildlife Program in Section 5 on page 76: **Summary of Draft Fish and Wildlife Program and Rationale**

At a recent public meeting the discussion became polarized by the binary choice of leaving the Eklutna Dam untouched or removal of the dam to restore the original habitat.

Alaska's constitution requires a balanced solution so that the needs of the public's resources for power, water, and fish habitat are met.

Currently dams are being removed in the lower 48. But that will not necessarily improve salmon reproductivity. A major component of the impact on the salmon population is increased predation in Alaskan waters and bycatch.

The loss of salmon habitat due the construction of the Eklutna dam was a mistake not in keeping with Alaska's constitutional requirement of balanced resource management.

On page 76, Section 5: Summary of Draft Fish and Wildlife Program and Rationale, appears to be a balanced solution to the problem for the following reasons.

- The lake is recharged every spring by the glaciers. Climate fluctuations could result in reduced lake capacity for one or more seasons.
- Fish passage to Eklutna Lake will not necessarily provide an increase in spawning area. Salmon can only spawn in a lake if there is sufficient upwelling.
- Most renewable energy is not a viable solution to replace the dam. Solar and wind require a way to store energy, so that supply to the grid is consistent. Solar is becoming more efficient, but there is still the problem of Alaska's harsh weather and lack of light during the winter. Wind turbines are designed to shut down when it reaches 22 below.
- MEA must maintain its profit margins if it is going to develop a renewable energy source such as tidal.

The plan as outlined in Section 5 on page 76 has the best chance of success.

Restoring 11 miles of fish habitat will also boost Alaska's recreational opportunities and economy.

--

Tim Swezey
tlswezey@gmail.com

From: yeldarb@gci.net
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Project Draft Fish and Wildlife Program Report October 2023
Date: Monday, February 19, 2024 4:56:00 PM

A public comment on this report.

Hello,

I thoroughly reviewed this 209 page report. The analysis was thorough, thoughtful, and well written. Kudos to all those involved in this effort. The \$44 million recommended option in Figure 2-1 wins. I agree with that conclusion and support the analysis that resulted in that study recommendation. Keep the Eklutna dam but allow a 10% reduction in water use for hydropower to keep the river flowing now that the lower dam is gone.

\$47 million was recently spent to increase the Bradley Lake Hydro project via the Battle Creek Diversion Project. Now the \$400+ million Dixon Diversion Project is being studied and likely will move forward. Why? Because hydropower is so dependable for our local needs. It would be extremely irresponsible to remove the Eklutna Dam while we are spending these large sums to add to our reliable hydropower. Very expensive LNG imports are in the future for Cook Inlet. That will be for home heating and electric power generation. Hydropower is cheaper and more reliable than electric power derived from LNG fuel, especially if the Eklutna Dam already exists!

There is a great deal of emotion being expressed by many who have commented on this Report. The days of the Cook Inlet region that existed 125 years ago are long gone. We now have a major civilization here in Cook Inlet. That requires a great deal of affordable/reliable energy to maintain. Civilization impacts the local environment. That is an inescapable fact. We can never "restore" this area to what it was. Now that civilization is here to stay in Cook Inlet we must provide it with affordable and reliable power. If not then we can plan of years of civilization decline in the local area.

Thank you,
Brad Neugebauer
BS Mechanical Engineering
MS Engineering Management
(retired)

From: [Brent Petrie](#)
To: [Sam Owen](#)
Subject: Eklutna Clean Water and Electricity
Date: Monday, February 19, 2024 3:36:04 PM

I have reviewed the positions of various parties regarding the Eklutna Water and Power project currently serving the Railbelt and Anchorage with clean water and renewable power. The utilities proposal to rewater several miles of the river is a practical and sufficient mitigation for improving habitat for several salmon species.

The importance of the dam to store water for public water supply and clean renewable electricity to hundreds thousands of people outweighs the destruction of the dam to admit red salmon to the same watershed. Four other species of salmon will likely be enhanced by modifying releases below the existing dam. This does not harm the water supply or energy production as much as destroying the means of water storage and is a reasonable measure.

Brent Petrie
Sent from my iPhone



MUNICIPALITY OF ANCHORAGE
MAYOR DAVE BRONSON

OFFICE OF THE MAYOR

February 19, 2024

Dear Eklutna Hydroelectric Project Owners,

I write to express support for the draft Fish and Wildlife Program and the inclusion of the AWWU Portal Valve alternative.

Given the critical importance of Eklutna Lake as our municipality's primary source of clean water, safeguarding its integrity and the integrity of AWWU water treatment infrastructure is vital. Preserving AWWU's rights and interests in the Eklutna lake and river system is of key importance. The 1984 Agreement requires the Owners to take no action which degrades the quality of Eklutna Lake as a drinking water source and the 1991 Agreement requires the consideration of municipal water supplies. I am pleased with the robust efforts undertaken by the project owners to ensure that the Fish and Wildlife Program prioritizes the protection of our drinking water. The Owners have coordinated heavily with AWWU to protect and account for the need for drinking water throughout the alternative evaluation process. Furthermore, these collaborative endeavors assessed infrastructure improvements and explored multiple viable solutions through the alternative analysis process. I believe the draft Fish and Wildlife Program will result in even stronger protections for AWWU and improved drinking water safety for all of Anchorage.

The significance of the Eklutna Hydro Dam to energy security cannot be overstated. It plays a pivotal, if understated, role in supplying energy reliability to consumers in southcentral Alaska. The recent cold snap in late January/early February highlighted this crucial role when available gas supply in the region was challenged. At the request of ENSTAR, Chugach and MEA adjusted operations at the Project to increase hydroelectric generation and decrease consumption of natural gas. These efforts avoided a switch to diesel fuel power generation and preserved ENSTAR's gas for other consumers. The timely hydroelectric utilization provided clean, storable, and dispatchable green energy instead of a switch to less sustainable and greenhouse gas emitting alternatives. Without the Eklutna Hydroelectric Project operating in the current configuration, such a switch and savings likely would not be possible. In light of the ongoing challenges to Southcentral's energy security, it is imperative that we preserve and optimize every available energy supply especially one as reliable, green, and cost effective as the Eklutna Hydroelectric Project.

I also wish to commend the Hydro Owner's adherence to the process outlined in the 1991 Agreement. For the last several years, the Owners have coordinated and cooperated with various stakeholders and interested parties, including the various state and Federal resource agency signatories to the 1991 Agreement and the Native Village of Eklutna. I know this is only a draft plan and that public comment and discussion are ongoing but I



MUNICIPALITY OF ANCHORAGE
MAYOR DAVE BRONSON

OFFICE OF THE MAYOR

believe the current draft holds great promise. The expected further revisions will only enhance and build upon the great work already accomplished. Despite expressions of impatience or desires to value singular interests over the whole, the Owners have progressed through the process diligently and conscientiously listening to and engaging with a variety of perspectives and alternative approaches to achieve the goals “to, protect, mitigate damages to, and enhance fish and wildlife”. I trust that this will continue to serve as a robust framework for the remainder of the current process and will again be effective into the future when the process repeats every 35 years.

I appreciate the unwavering commitment to the well-being of the entirety of our community expressed in the draft Fish and Wildlife Program and look forward to the final version and the decision of the governor. Thank you to the Hydro Owners, the Native Village of Eklutna, AWWU, and the various stakeholders and members of the public who have participated and commented throughout this process.

Sincerely,

Mayor Dave Bronson
Municipality of Anchorage

From: [P.Doty](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Monday, February 19, 2024 11:32:56 PM

live in Anchorage and support the owners version for the Eklutna dam. The assembly is Not representing my interests and the Eklutna dam should Not be removed. Removing the dam is short sighted, does not consider all the consequences of removal and will harm the residents in Anchorage, take away a large portion of the water and electricity with no feasible, viable, less expensive and less environmentally harmful alternative. It will further adversely impact the already failing city and it's residents and businesses, their economic, water, and electricity, make it even more expensive to try to live here, pay your living expenses, reduce property values, opportunitites all in the false and erroneous belief of helping the environment. The solar, wind, other alternatives are just as or more harmful to the environment if you look at the total picture of prohibitive costs, how well they work, rare earth minerals, what happens to their components when they breakdown, etc. The several hundred thousand innocent residents of Anchorage should not be forced to bear the excessive costs, have their cost of living, living expenses, water, and electricity and lives adversely impacted by removal of the Eklutna dam or any major alteration of the dam. Anchorage residents should not be discriminated against and treated as second class citizens or told to go find some other source for water and electricity.

From: Patti Randlett <plrandlett@gmail.com>
Sent: Monday, February 19, 2024 8:52 PM
To: Sam Owen <info@eklutnahydro.com>
Subject: Eklutna Draft Plan

The recent media attention regarding the relicensing of the Eklutna Hydro Project prompted me to read more about this source of renewable energy.

The Draft Fish and Wildlife Program document is impressive in the magnitude of planning and study that went into its creation starting back in 2019. The 8 points the Governor must consider listed in the 1991 Agreement seemed to guide the process and were addressed.

After reviewing the Draft Program it is evident that it was a long and well thought out process. Inclusion of many interested parties is evident in documents created throughout the lengthy project.

The Eklutna Hydro Project website is informative, detailed and impressive. Any question I had was answered here. I would encourage any interested party to explore all the information offered.

Ultimately, I believe the southcentral community will be better off with keeping the Eklutna project and dam intact. It is apparent the utility owners have written the Draft Program with thoughtful research based consideration guiding their proposal for returning water to the Eklutna River and creation of fish habitat.

At this late point in the relicensing process dam removal and eliminating a renewable energy source doesn't seem like a prudent or fiscally responsible option for rate payers.

Patricia Randlett

Member of CEA and MEA

I would also anticipate that interested groups would continue their endeavors to remove and replace the dam with renewable energy sources. I would hope that this would be accomplished by keeping the utility rate payers whole through finding alternative funding sources to accomplish this undertaking.

B-4. Against Draft Program

This page intentionally left blank.

From: [steve.parker](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 6:13:39 PM

CAUTION: This email was received from an external source

the utilities don't really care what you think: they've got the governor in their pocket.

this whole process has been a sham. the utilities have colluded with the alaska energy authority, the city administration, and the commissioners of DNR and ADFG to rig this process.

why? because eklutna hydro is a cash cow that produces \$19 million in revenue every year. consider that the utilities bought the hydroproject from the feds in 1997 for \$6.7 million.

from the beginning the utilities have ducked and dodged their responsibility to fix the broken eklutna river. the hydroproject dried up the eklutna river for the past 69 years. see for yourself. walk the river below eklutna lake. its dry or mostly dry for 8 miles.

how do the utilities propose to mitigate for 69 years of damage? they want to put a spigot in the AWWU (anchorage water and wastewater) pipeline and allow a trickle (~10% of normal flows) of water to enter the river one mile below eklutna lake. IF THE UTILITIES GET AWAY WITH THIS, THEY GET TO KEEP THEIR EKLUTNA CASH REGISTER FOR ANOTHER 35 YEARS.

the original problem that got us here was "the loss of a sockeye salmon run." news flash: sockeye salmon spawn in lakes, and they can't walk the final mile to get to eklutna lake.

don't you wanna have a sockeye run that doesn't mean driving to kenai or chitina? eklutna could be that place, but only if we tell the utilities to get lost. and don't believe anyone who says there won't be any public fishing access - there already is public access to eklutna lake and the upper eklutna river.

if you live on city water, as i do, you should be concerned about the utilities' plan to use the AWWU pipeline to create a dead-end river. the awwu guys have a lot of issues with that plan, and worry it might jeopardize the reliability of a system that supplies 90% of anchorage's drinking water. but they've been told to sit down and shut up by the guy who signs their paycheck.

there is no end to the corruption at eklutna. the people running this show have distorted the data, misrepresented facts to the public and elected officials, denigrated the eklutna dena'ina, and ignored the advice of the state and federal biologists. at the public meetings, where the public should have the opportunity to "testify" as the 1991 agreement requires, you can tell it to an ipad.

there are 6 parties to the 1991 fish and wildlife agreement (7 if you include the native village of eklutna), and 5 of them do not support the proposed alternative. the us fish and wildlife service, the national marine fisheries service, the municipality of anchorage and the native village of eklutna are opposed to the plan. only chugach electric and matanuska electric support their own plan.

don't join them. don't let them raise your rates, raise your taxes, mess with your drinking water, and keep you from catching fish.

Audio Recording Transcription of Chennery Fife

January 16, 2024, 2:00-4:00pm, Palmer Community Center (Depot), Palmer AK

"My name is Chennery Fife. I live in Anchorage. And I would like to tell the utilities that I don't think this plan is up to the task of what the 1991 Agreement said by not providing fish passage, by leaving a mile of the river dry, and by releasing only 40 CFS in the summer, it will not mitigate the harm done to fish and wildlife and will not make up for the harm done to the Native Village of Eklutna."

Date: January 16, 2024

To: Planners & operators of the Eklutna Hydroelectric Project

From: Ellen VandeVisse, biologist

Re: comments on Eklutna Mitigation Plans

If you're like me, you always strive to do a good job, and welcome and value ways to improve draft work that a wider perspective brings in.

It is in that spirit that I speak to the current mitigation plan.

We live in a world constantly notified of another habitat lost, another species extinct, another culture & its wisdom shoved aside, another beautiful place destroyed. With this project, we Alaskans have an exciting opportunity to reverse degradation, bring back our salmon, and create a win-win future with restoration.

Rather than the current mitigation plan

- Dam removal or dam modification that does not allow salmon to do their migration or return upriver, due to a mile of dry bed,
- Restricts water flow way below minimum needs for a stream ecosystem & healthy salmon
- Costs more than it benefits
- Puts low quality water into the habitat from the AWWU

I urge you to develop the alternatives and remedy some weak points. That is, build features that:

- Restores the Eklutna River to flow naturally out of Eklutna Lake.
- Reverses 100 years of cultural and environmental neglect.
- Allows for the recovery of salmon, by re-connecting the river to the lake, opening up 65% of their available habitat in Eklutna Lake and its upstream tributaries
- Saves utility ratepayers and MOA taxpayers from rate and property tax hikes to pay for a \$57 million for a plan with few benefits.
- Provides time to transition to new renewable energy projects.
- Does not jeopardize the Anchorage drinking water system.
- Protects popular lakeside trails from erosion caused by fluctuating lake levels.

We will be watching and cheering you on as you revise your drafts and revitalize a treasured area.

Thank you

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional):

Julian Ramirez

Email:

julian.c.ramirez28@gmail.com

Write your comments on the Draft Fish and Wildlife Program here:

The Draft Fish & Wildlife Program is a failure. It fails to mitigate the harm done to sockeye salmon - the reason for the draft program. The Project Owners are breaking their legal obligations and taking the position of the Eklutna People for granted. This process tells one story and expects the public to ~~to~~ comment in private, preventing a conversation from occurring and all of the facts to be laid out.

Please note all comments will be published online to www.eklutnahydro.com

☒ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email: *margie@kingseye.net*
Margie Mac Neille

Write your comments on the Draft Fish and Wildlife Program here:

1. I oppose half-measures. The 1-mile dry proposal is a short-term expedient with long-term consequences. It will be seen as a costly mistake. Rip the bandaid off (work to remove the dam etc) and adjust to the consequences.

2. In concept the Eklutna/Toutle limited proposal to remove the dam without public investment is one I favor - but I have questions - what does it mean 'replace' the power from the hydro project?

3. I did not see any forecasting of instream lake levels under different climate change scenarios.

Please note all comments will be published online to www.eklutnahydro.com

☒ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Marylee Hayes, Resident of Eagle River, Alaska

Write your comments on the Draft Fish and Wildlife Program here:

I Trust that the Fish & Wildlife Plan, proposed for The EKLUTNA River, will be to "By All means" include a long term Vision of meeting the Needs of the SALMON, the EKLUTNA Peoples, and be according to the legal obligation, to Mitigate any projects' impact on our Fish and Wildlife.

* Releasing only 3% ^{or so} of The Historic River Flow will Not provide enough Fish passage and restore the River's Salmon. I think any decision ~~should~~ ^{should} prioritize Restoring the River's Salmon AS soon as possible.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email: bwbeak@gmail.com
Ted Sky Heller, Owner of Bluewater Basecamp, Eklutna Resident, Former MEA
Contract Employee.

Write your comments on the Draft Fish and Wildlife Program here:

1. I would like to know what the ownership group has been doing to prepare financially for this project? They knew they would need to replace habitat etc ~~since~~ since they signed the agreement. At this time they are only talking about rate hikes and taxation to pay for the project that they knew was coming and should have been preparing for financially.

2. I support restoring salmon all the way to the lake. A partial flow does not meet the original intent of the agreement.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Audio Recording Transcription of Aaron Leggett

January 17, 2024, 6:00-8:00pm, Arctic Center, Anchorage AK

"My name is Aaron Leggett, I live in Anchorage. I have the honor of being the President of the Native Village of Eklutna for the past almost six years. I've been on the Council since 2007. I'm submitting my comments today on the Eklutna hydro project. I've been intimately involved with every aspect of it, from the lower dam removal to where we are today. And overall, I want to say that I'm a bit disappointed in the way that the overall process has went. I continue to remain optimistic. I believe that what's currently being proposed by the utilities is inadequate, and I hold out hope that we can come to a more reasonable compromise that doesn't put so much burden on the Native Village of Eklutna and fish passage. I believe that by rehabilitating the Eklutna River and putting another major salmon-producing stream for all five species, again, all five, in Upper Cook Inlet, will not only benefit the Native Village of Eklutna, but it will benefit all residents in South Central Alaska. I'm sensitive to the fact that the utilities are beholden to their ratepayers and also to their commitments with renewable energy as they move forward. That being said, I do believe that we can find a more equitable compromise. And I believe that most Alaskan residents, especially those within the municipality of Anchorage, value salmon habitat and salmon restoration. And I don't think the utilities are looking at the overall impact that a more fully restored river will have, not only on the flora and fauna of the area, but other economic benefits that might incentivize some of the landholders, like Eklutna Inc. and others, to want to develop recreational opportunities as well as new housing opportunities, which then would increase taxpayers and ratepayers and would lead to a growth in Anchorage. I was born here in Anchorage, lived here my entire life. And in the last few years, for the first time in decades, we're seeing an outmigration from our area. And you have to wonder, why are we seeing an outmigration from our area? How do we, as good community partners, come together, work on a solution that's long term, that's based not just in the next 5 or 10 years, but looks at the next 100 years of our community. And I believe that having a healthy, more completely restored, Eklutna River fits into that overall goal. Thank you."

From: [Scott Hayden](#)
To: [Sam Owen](#)
Subject: I support the Community Alternative
Date: Wednesday, January 17, 2024 10:12:46 AM

Restoration of the Eklutna river is important to Alaskans, the people of Eklutna, and anglers in southcentral Alaska.

I do not like the alternative that pipes water for a mile before returning it to the river. This is an expensive partial solution. The community alternative restores the whole river, restores the areas upstream of the lake, and does it at no cost to Anchorage ratepayers.

My only issue with this plan is that it does away with clean electricity for Anchorage. I would like to include a plan to pay for additional green energy included in this alternative.

Sincerely,
Scott Hayden
12304 Hilltop Dr
Anchorage AK 99515
Voter

From: [Brad Meiklejohn](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 4:32:39 PM

CAUTION: This email was received from an external source

The Draft Fish and Wildlife Program is based on a false premise.

Page 44 of the Draft says “As required by the 1991 Agreement, the Draft Program gives equal consideration to the purposes of:

1. Efficient and economical power production
2. Energy conservation
3. The protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat).
4. The protection of recreational opportunities
5. Municipal water supplies
6. The protection of other aspects of environmental quality
7. Other beneficial public uses
8. Other requirements of State Law.

This is not what the 1991 Agreement says. The Agreement says that “the Governor shall (not “must” as the Draft says on page 2) give equal consideration to” the terms listed above.

It is inappropriate for the Project Owners to give equal consideration to these terms. That is for the Governor. The sole purpose of the 1991 Agreement is the protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat.)

From: [sara thomas](#)
To: [Sam Owen](#)
Subject: Eklutna Hydro project comment
Date: Friday, January 19, 2024 4:24:56 PM

Good afternoon,

I would like to submit a comment on the Eklutna dam restoration project draft proposal. As a Chugach Electric & AWWU user and resident of Anchorage, I appreciated the presentation at Arctic Rec Center the other day. I was struck by the brief reasoning given for why the “project owners” did not support the Eklutna tribe’s stated directive to eventually restore the river to its original water flow. All the financial considerations aside, the right thing to do for equity and for wise practices for living on Earth is to listen to the Indigenous people whose lands have been sacrificed for our (often wasteful) use of power and water.

One way the loss of this power could be mitigated is to lead a real city-wide effort to eliminate wasting electricity, at the very least. That could easily bring down the need for that 3% of electricity that the hydro plant currently provides our municipality.

One other thing I’d like to point out is that in the cultural resources inventory, instead of saying there were no pre-contact cultural resources found in the area, which upon questioning is not entirely true, it should be simply stated that there were findings of cultural significance in the area but that they were kept confidential due to cultural sensitivity. It is worth acknowledging the truth as it is.

Respectfully,
Sara Thomas

Sent from my iPhone

From: [Heidi Frost](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 24, 2024 5:41:59 PM

Hello, my name is Heidi Frost. As a member of Chugach Electric, I would like to express my concern about the proposed plan. It appears that the proposal puts the environmental impacts and the needs of the Native Village of Eklutna behind the wants of MEA and CEA members. This is not acceptable as we need to live up to our obligations and the promises made over 30 years ago.

It is crucial to remember that all parties agreed on what needed to be done, and it is not fair to renege on the promises made. The current proposal does not live up to the intent of the signed agreement, and we need to ensure that we fulfill our commitments, even if it negatively impacts the members of MEA/CEA.

Moreover, the proposal raises concerns about the negative impact it could have on AAWU and our drinking water. It seems that some responsibilities are being pushed off onto another utility, which is not fair or equitable.

Finally, the proposed plan will cost \$57 million and will only free up a small portion of Eklutna River, failing to restore the salmon to the river as promised. It is selfish to move forward with this plan and ask Alaskan Natives to put aside the promises made and acquiesce for the 'greater good.'

We need to reconsider this proposal, live up to the promises made, and stop making others pay for our energy consumption needs. This idea couldn't have been made with all the players in the room. It's great for MEA/CEA, but terrible for the Native Village of Eklutna and its residents, the fish and wildlife of the area, and potentially the residents of Anchorage if the drinking water is impacted.

Thank you.

Heidi Frost
Anchorage, Alaska

From: [Lisa Sinnott](#)
To: [Sam Owen](#)
Subject: Eklutna River
Date: Friday, January 26, 2024 5:52:06 PM

I have read much of the documentation on your website and attended the public meeting in Eagle River on January 17. I am very much opposed to your preferred solution and hope you will continue to work with Native Village of Eklutna and other stakeholders to find a way to fully restore the river. Anything less than full restoration is unacceptable.

Lisa Sinnott

From: 4fjord4@everyactioncustom.com on behalf of [Richard Anderson](#)
To: [Sam Owen](#)
Subject: Citizen Comment
Date: Friday, January 26, 2024 5:25:45 PM

Dear Owners of The Eklutna Hydroelectric Project,

When the Eklutna dam and hydro project was built we did not consider things like loss of salmon habitat. Now is an opportunity to rectify our past oversight. The project should be reconfigured so that salmon have full access to the full run of the Eklutna River as well as full access to the Eklutna Lake and its tributaries. Some water could still be used for hydroelectric power production and some could still be used for municipal water consumption, but the full river and lake should be available for fish as well.

Thank you for your consideration.

Sincerely,
Richard Anderson
2321 Legacy Dr Anchorage, AK 99516-2643
4fjord4@gmail.com

From: [Pat Pourchot](#)
To: [Sam Owen](#)
Subject: Eklutna River plan
Date: Monday, February 5, 2024 10:57:27 PM

The plan recently released by the utility companies falls far short of what was envisioned in the transfer of the Eklutna power project in requiring an abatement plan for the adverse impacts caused by the damming of the Eklutna River. The plan which would leave a mile of the upper river dry below the lake dam doesn't come close to addressing the need for the restoration of the historic salmon resources of the river and the lake.

Most recently the Anchorage Assembly has called for a halt to this plan and much more thorough and comprehensive study of the impacts on municipal drinking water, the fishery, all viable options, and other issues. In light of the apparent self-serving analysis by the utility companies, this seems like a prudent approach at this point. While the lake provides power and water to our community, there are other valuable resources inherent in a free-flowing river that merit full consideration and protection.

Pat Pourchot
17000 Belarde Ave., Anchorage, AK 99516

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.



February 7, 2024

Sent via email

Eklutna Hydro Program Development Team /
McMillen Corp.
2607 Western Ave, Unit 360
Seattle, WA 98121

Re: Public comment on Eklutna River Fish and Wildlife Program

Eklutna Hydro Project Development Team,

On behalf of Cook Inlet Region, Inc. (CIRI), I am submitting comments about the Eklutna River Fish and Wildlife Program (the Plan) released in October 2023.

I. Introduction

CIRI is one of twelve land-based Alaska Native Regional Corporations formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA), 43 U.S.C. 1601. CIRI is comprised of over 9,200 Shareholders who live in Alaska and worldwide.

With 529,500 acres of surface estate and 1.6 million acres of subsurface estate, CIRI is one of the largest private landowners in Southcentral Alaska. CIRI's regional boundary and landholdings extend from the Matanuska-Susitna Borough, through the Municipality of Anchorage and the Kenai Peninsula Borough. Within CIRI's regional boundary are eight federally recognized Tribes and seven Alaska Native village corporations formed under ANCSA. CIRI and its affiliated Tribes and Village corporations are leaders in Alaska and collectively work for the benefit of our mutual stakeholders.

CIRI prioritizes the use of its land by Shareholders and Descendants for cultural, subsistence and recreational activities. CIRI regularly provides access opportunities on CIRI's privately owned land to the public.

CIRI manages a diverse and strategic investment portfolio for the long-term benefit of CIRI Shareholders and Descendants. CIRI has investments in energy and infrastructure, with a focus on renewable and green energy, along with significant Anchorage real estate investments. Notably, Fire Island Wind LLC, a CIRI company, owns and operates the 17.6-megawatt Fire Island Wind Project, located three miles off the coast of Anchorage. The project began delivering clean, renewable energy to Anchorage homes and businesses in the fall of 2012.

II. Comments on the Eklutna Draft Fish and Wildlife Program

The Eklutna Draft Fish and Wildlife Program is a requirement of the 1991 agreement (the Agreement) between the project owners and intended to be a substitute for the Eklutna Purchasers to obtain required licenses from the Federal Energy Regulatory Commission (FERC) at the time. The Agreement required the parties involved to study and understand the impacts over time of the Eklutna Dam (the Project) on fish and wildlife and develop proposals for the protection, mitigation, and enhancement of fish and wildlife affected by the Project.

Considering the region's energy and drinking water needs, the Plan does not adequately protect the Eklutna River or mitigate damage to the ecosystem caused by a river with years of no outflow. CIRI recommends the Plan be modified, or an alternative plan be adopted, to restore water flow to the full length of the Eklutna River.

The 1991 Agreement requires the project owners to mitigate the damage to fish and wildlife along the river due to the Project, and the Plan, as currently drafted, fails to provide adequate mitigations. The Plan leaves a section of the Eklutna River dry, and thus does not allow salmon access to spawning habitat and does not remedy the harm caused by the Project as required by the 1991 agreement.

The Agreement was intended to work "at least as well as Federal regulation for the intended purpose of mitigation and enhancement of affected fish and wildlife resources." The intent of highlighting mitigation efforts in the Agreement was impacted ecosystem restoration. Addressing the Project's impacts on fish and wildlife resources would be a requirement of the Project, were it to operate under FERC permits, and any mitigation or enhancement efforts that do not restore flow to the full length of the Eklutna River fall short of the Agreement.

While the actions taken, and engagement in the public process follow the requirements outlined in the Agreement, the recommendations made in the Plan do not. The lack of flow to the entire river, as outlined in the Plan, is defended with the specter that attempts to restore flow to the entire Eklutna River would result in ratepayer increases and impacts on the region's drinking water supply.

III. Conclusion

CIRI urges Eklutna Hydro and the Project owners to consider a Fish and Wildlife Plan that suitably balances the community's needs with their responsibility to adhere to the Agreement: mitigation and protection efforts that truly address the damage caused to the Eklutna River ecosystem and salmon runs.

Thank you for your consideration and the opportunity to provide comments on the Draft Eklutna Hydro Fish and Wildlife Program. Please contact me at (907) 274-8638 or slukin@ciri.com to discuss CIRI's comments further.

Sincerely,



Sarah Lukin
President

CC: Governor Michael J. Dunleavy
Christopher Constant, Anchorage Assembly Chair
Aaron Leggett, Native Village of Eklutna
Kyle Foster, Eklutna, Inc.
Tony Izzo, Matanuska Electric Association
Arthur Miller, Chugach Electric Association



MATANUSKA-SUSITNA BOROUGH

Fish & Wildlife Commission

Planning and Land Use Department

Planning Division

350 East Dahlia Avenue • Palmer, AK 99645

Phone (907) 861-7833

<http://www.matsugov.us> • planning@matsugov.us

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,

A handwritten signature in black ink that reads "Andrew N. Couch". The signature is fluid and cursive, with the first name "Andrew" being more prominent than the last name "Couch".

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

From: [Eric Booton](#)
To: [Sam Owen](#)
Subject: Eklutna Mitigation Public Comment
Date: Tuesday, February 13, 2024 9:16:00 AM

Please accept the following comment on behalf of Eric Booton, CEA ratepayer.

Since its construction, the Eklutna Hydroelectric Project has grossly harmed a wild salmon stream of significant cultural importance. Now, nearly 70 years later, the time has come for project operators to take ownership of its impact. As currently operated, the obstructive project utilizes a diversion dam at the outflow of Eklutna Lake to block all of the water that would otherwise flow down the Eklutna River. Instead, 100% of the water is diverted - 10% of which is utilized to meet 90% of Anchorage's drinking water needs, 90% generates a scant amount of electricity before releasing the water into the neighboring Knik River. With no water flowing out of Eklutna Lake more than 8 miles of the Eklutna River are devoid of flowing water and the passage of adult and juvenile wild salmon into and out of Eklutna Lake is blocked. For nearly a century, salmon have clung to existence by a trickle of water as the health of the wild salmon population has been significantly diminished as a result of project operators' elective use of water.

The Eklutna Hydroelectric Project was sold by the federal government to the operators through a unique act of congress that came with the obligation to make up for the project's impact to fish and wildlife and their habitat. The sale also included a one of a kind arrangement allowing for the project operators to circumnavigate the FERC licensing process and lead their own mitigation process. While project operators and contractors sing their own praises, reality is the mitigation process so far is unworthy of celebration and has been marred with skepticism and concern by several parties and technical experts who contributed to it.

Following the review of the field studies, numerous alternatives were submitted by members of the technical working group that would appropriately balance the use of Eklutna Lake water in a manner that preserves access to drinking water, allows for continued operation of the project and appropriately meets the needs of wild salmon. It is disheartening to see that the project operators have taken advantage of their power under the 1991 agreement with a bullheaded attempt to overlook their project's impact and check the mitigation requirement box by doing as little as possible - which is exactly what we have witnessed with the the preferred alternative they have shared with the public.

The draft mitigation plan presented by the operators of the Eklutna Hydroelectric Project fails to make up for the project's impacts as required by the 1991 agreement and allows the project operators to pass the burden of responsibility to AWWU. The AWWU portal option presented is inadequate and concerning for the following reasons:

-

Only 40 cfs will be released in the summer (4% of historic flows) and 27 cfs in the winter. This is far from enough water to provide Eklutna River salmon with reliable access to spawning and rearing habitat, much of which is located in side channels that will be left dry with only 40 cfs of water. Additionally, the public is right to be skeptical that 27 cfs is an adequate winter flow for the survivability of salmon eggs.

- Water will be released into the Eklutna River from the AWWU pipe approximately a mile below the diversion dam at the outflow of Eklutna Lake. As a result, a mile of the Eklutna River will be left dry.
- Without flowing water, wild salmon will still be blocked from migrating to and from Eklutna Lake and accessing the historic habitat in Eklutna Lake and its tributaries.
- Without access to Eklutna Lake, sockeye salmon will not be able to recover.
- The AWWU pipeline provides Anchorage's drinking water, the most important use of Eklutna Lake water. The operators preferred alternative places concerning and unnecessary stress to AWWU's infrastructure and is a risk to the drinking water supply of nearly all of the area residents.
- AWWU infrastructure undergoes routine maintenance in which the flow of water in the pipe is turned off. Regular maintenance of AWWU infrastructure will leave the Eklutna River dry during its duration and wild salmon at all life stages will be harmed.
- The AWWU portal draws water from an intake valve at the bottom of Eklutna Lake where it is significantly colder than the surface water that would flow down the Eklutna River under a normal flow regime. As a result, water from the AWWU portal may very well be too cold for the recovery of salmon. This concern has been made abundantly clear in the case of the botched mitigation of the Cooper Creek project where Chugach Electric Association has spent years attempting to engineer a solution that will pipe water of the appropriate temperature past the Cooper Creek dam and into Cooper Creek.

The Eklutna Hydroelectric Project does not provide flowing water to 8+ miles of the Eklutna River and does not allow fish passage to Eklutna Lake. The preferred alternative of the project owners only satisfies their interests and fails to mitigate any of the impacts that the project they are responsible for created. To this point, it is a devious attempt to escape responsibility and do little more than continue business as usual.

Area residents and the Eklutna people have held hope for a fully functioning and healthy

Eklutna River since the removal of the abandoned lower Eklutna dam in 2018 which removed a major barrier to reviving the fractured river system and mitigation of the Eklutna Hydroelectric Project has been the long anticipated opportunity to further repair the system with flowing water and fish passage. Additionally, the late Representative Young and his successor, Representative Peltola, have expressed their support for Native Village of Eklutna and restoring the river. The Anchorage Assembly has reiterated their support for restoration through numerous bi-partisan actions and the MatSu Fish & Wildlife Commission has also provided letters to the project operators reiterating the need for adequate flow and fish passage.

Though the mitigation process began in 2019, the public wasn't officially invited into the mitigation process until late 2023 when the draft fish and wildlife plan was released for review and comment. In January 2024, public meetings were hosted in Palmer, Anchorage and Eagle River. For 5 years many members of the public have been waiting for their opportunity to formally support restoring the Eklutna River by sharing their comment with the utility owners at the public meetings, the primary public engagement moment in the mitigation process. Without discussion or opportunity for public comment, I was vehemently dismayed when the "public meeting" was little more than a public relations presentation that the public was asked to attend. It is clear that the public meetings were engineered to minimize public involvement and promote the biased preferred alternative of the project owners as if it is the public's only option.

It is important to remember that the draft fish and wildlife plan is indeed a draft, and as written, it cannot be accepted by the public and ratepayers, and should not be accepted by Governor Dunleavy or the Parties to the 1991 Agreement. The AWWU portal put forth by the project operators still bears a \$57 million price tag - that's \$57 million that will be wasted on a mitigation plan that will leave the river fractured and fail to lead to a salmon fishery of any abundance. Yes, a mitigation plan that will meet the needs of wild salmon will come with additional costs, but those initial costs will come with significantly increased reward for Alaskans and the Eklutna people. This is why several groups, including Native Village of Eklutna, Eklutna Inc, The Conservation Fund and more, are on the record having committed to raise the funding necessary for engineering alterations to assist the utilities in enacting a mitigation plan that is likely to actually recover wild salmon.

To make up for the project's impact to fish and wildlife and their habitat, in honesty, it is critical that the final fish and wildlife plan include adequate flowing water the entire length of the Eklutna River and fish passage to Eklutna Lake for adult and juvenile fish. The AWWU portal is not a viable option and should no longer be pursued. Numerous alternatives were provided by members of the technical working group that would make an appropriate alternative to the AWWU portal and should be reconsidered, though removing the diversion dam is likely the best alternative to preserve drinking water, meet the needs of fish, and still

allow the Eklutna Hydropower Project to operate. Being that the mitigation process has been poorly conducted and stakeholders are far from agreement with the project operators, extending the process to avoid rushing to make a decision of severe consequence is a very reasonable request.

We built these dams and they have cost us, and the Eklutna people, more than we will ever fully know. Modernizing the operation of the Eklutna Hydroelectric Project to operate with a minimal impact to natural resources is both honorable and very achievable and any loss in power generation can be easily recovered with more renewables. Wild salmon are slipping throughout Alaska and, in the case of the Eklutna River, we do not have to accept a struggling salmon fishery, and it's not a future the Eklutna people should be asked to accept.



ASSEMBLY LEADERSHIP

CHRISTOPHER CONSTANT | CHAIR

MEG ZALETEL | VICE CHAIR

February 16, 2024

sent via email

Dear Eklutna Hydroelectric Program Development Team,

Please accept the attached reports as comments on the Draft Fish and Wildlife Program for the Eklutna Hydroelectric Project.

The Anchorage Assembly has had concerns about unaddressed issues in the Draft Wildlife Program (AR 2024-40, As Amended), and therefore enlisted a consultant to research and report on those issues. The attached executive summary and full report were completed by Mr. Donald Spiegel with GV Jones & Associates, Inc.

Mr. Spiegel was retained to review the concept of providing Eklutna Lake water to the Eklutna River from an AWWU Portal Release Facility from both engineering and operations viewpoints. Mr. Spiegel is uniquely qualified to serve in this role due to his experience in the planning, design, construction and operation of water supply projects, his 45 years of experience on Water Supply and Water Treatment Engineering projects, and his five years of experience as Project Engineer and Lead Field Engineer on the design, construction and startup of the Eklutna Water Project.

Mr. Spiegel's review of project documentation for the AWWU Portal Release Facility coupled with his historical knowledge of the Eklutna Water Project identified significant project issues as are detailed in the attached reports.

Sincerely,

Assembly Chair Christopher Constant

District 1, North Anchorage

Assembly Vice Chair Meg Zaletel

District 4, Midtown

Attachments:

1. Executive Summary for Project Issues Paper
2. Project Issues Paper

EXECUTIVE SUMMARY
Eklutna River Restoration Project
Project Issues Paper
GV Jones & Associates, Inc.
1200 E 76th Ave
Anchorage, AK 99518
Author: Donald Spiegel, P.E.
(February 14, 2024)

About the Author and the Author's Role:

Mr. Donald Spiegel has 45 years of experience on Water Supply and Water Treatment Engineering projects. He has a Bachelor's Degree and a Master's Degree in Environmental Engineering and has been involved with projects around the world with costs ranging from \$5M to almost \$5B. Mr. Spiegel was retained to review the concept of providing Eklutna Lake water to the Eklutna River from an AWWU Portal Release Facility from both engineering and operations viewpoints. Mr. Spiegel is uniquely qualified to serve in this role due to his experience in the planning, design, construction and operation of water supply projects but also based on his five years of experience as Project Engineer and Lead Field Engineer on the design, construction and startup of the Eklutna Water Project. Mr. Spiegel's review of Project documentation for the AWWU Portal Release Facility coupled with his historical knowledge of the Eklutna Water Project resulted in the identification of significant Project Issues as are detailed in this Project Issues Paper.

Executive Summary

The first Eklutna Hydroelectric Project was constructed in the late 1920's by Anchorage Light and Power Company. In 1950, the Federal Government, through the United States Bureau of Reclamation (USBR), proposed raising the original dam to create a larger lake that could provide more electric power to Southcentral Alaska. This Project, called the Eklutna Hydroelectric Project, was completed in 1955. In 1967 the Alaska Power Administration (APA) was established and all responsibility for the operation and maintenance of the Eklutna Hydroelectric Project was transferred from the USBR to APA. In 1991, the Federal Government agreed to sell its interest in the Eklutna Hydroelectric Project to a trio of local electric utilities: (1) Municipality of Anchorage dba as ML&P at a 53.33% share; (2) Chugach Electric Association at a 30.0% share; and (3) Matanuska Electric Association at a 16.67% share. As part of this 1991 Agreement, the new "Project Owners" agreed to develop and propose a program to protect, mitigate damages to, and enhance fish and wildlife impacted by the original Federal Hydroelectric Project. The program would necessitate the development of a year-round release of water to the Eklutna River. Ownership of the Eklutna Hydroelectric Project was officially transferred from the Federal Government to the new Project Owners on October 2, 1997.

In 2019, the Project Owners began a consultation process to discuss alternatives for providing year-round release of water and periodic channel maintenance flows from Eklutna Lake into the Eklutna River. This resulted in a three-year effort to study alternatives and to consult with environmental stakeholders. The study's selected alternative consists of construction of a new isolation valve structure and a new river release structure located adjacent to the Anchorage Water and Wastewater Utility (AWWU) Eklutna Water Project (EWP) Portal Valve Shaft approximately one mile below the Eklutna Dam. This alternative, called the AWWU Portal Release Facility, relies on use of existing AWWU infrastructure. The selected alternative, however, creates policy and infrastructure issues for AWWU that are discussed herein.

The review provided in this Project Issues Paper that follows this Executive Summary contains the following sections:

1. Introduction
2. Project Definition for the AWWU Portal Release Facility
3. Governance Issues
4. Description of the Eklutna Water Project Facilities
5. Eklutna Water Project Raw Water System Hydraulics
6. Review of AWWU Portal Release Project Facilities

Review of Project documentation for the AWWU Portal Release Facility coupled with the Author's historical knowledge of the EWP resulted in the identification of significant Project Issues as follows:

Issue #1 is a Governance Issue. The Project Owners represent the power production interests for the Project. Information exchange and dialogue with State and Federal resource agencies and some environmental interests have also occurred but little engagement from the water supply interests (specifically AWWU, but also the Alaska Department of Environmental Conservation, ADEC) appear to have taken place. In the documentation to date, there is no mention of future expansion plans of EWP facilities nor the certainty of emergency shutdowns and inspection/maintenance shutdowns of EWP facilities. In addition, there is no discussion of the present condition of the Intake Valve Shaft nor the Portal Valve Shaft which are both 35 years old. Expansion of the Eklutna Water Treatment Facility (EWTF) would severely limit the ability to divert water from the AWWU Portal Release Facility both in terms of time-of-year and likely in flow. And shutdown of EWP facilities, which will continue to occur, would stop the flow to the Eklutna River entirely. If AWWU facilities are to be used as part of the solution for providing year-round flow to the Eklutna River, dialogue and engagement with AWWU and ADEC are critical to ensure the long-term health and safety of the Anchorage Public Water System (PWS). ADEC will likely be interested in why a Public Water System is also being used as a River Restoration System.

Issue #2 is an Opportunity Cost Issue. The EWP was originally designed and constructed to serve a PWS demand of 70 mgd – which is 108.5 cfs. The EWP piping, both raw water and treated water, were designed and constructed for the 70 mgd system flow; the EWTF was designed and constructed for a plant flow of 35 mgd to more closely match the PWS demands at the time of construction. The EWTF, however, was designed and is configured to allow easy expansion to 70 mgd. No mention of the future expansion of the EWTF to 70 mgd is acknowledged in the AWWU Portal Release Facility documentation to date. The need to expand the EWTF in the future could occur for a number of reasons, including: (1) population increase particularly North of the Anchorage Bowl; (2) diminishing groundwater supply due to contamination from PFAS, de-icing compounds, arsenic and/or other contaminants; and (3) possible decrease in Ship Creek supply due to water rights issues and creek flows during certain times of the year (military and maintaining minimum creek flows have priority over the AWWU use). To forego the opportunity to expand the EWTF to 70 mgd, and thus to forego expansion of the AWWU PWS in the planned manner that has existed for over 30 years, must be considered a significant policy decision for the MOA. To supply future drinking water from a source other than Eklutna Lake would certainly increase the cost of water in Anchorage significantly in the future.

Issues #3 (Scheduled Maintenance) and #4 (Emergency Maintenance) are Public Relations Issues. The EWP raw water facilities, including the Intake Valve Shaft and the Portal Valve Shaft have mechanical, electrical, and instrumentation and control equipment that require periodic maintenance work that necessitates scheduled shutdown of the EWP. These scheduled shutdowns can last days or longer depending on the maintenance needs. In addition, the raw water facilities have automatic and manual emergency shutdown capabilities in case of damage due to earthquake, terrorism, or vandalism that also result in long outage times. Draining and refilling raw water facilities can add significant time to these shutdowns, whether scheduled or emergency. It must be understood that use of the AWWU Portal Release Facility does not provide

a 100% certain year-round water supply to the Eklutna River. Scheduled maintenance shutdowns as well as periodic emergency shutdowns will continue to occur and discharge of water to the Eklutna River during these events will stop. The resulting impact to fish spawning habitat and the fish population itself will be of major public interest, potentially manifesting as negative public opinion towards MOA in general and AWWU specifically. Simply stated, the AWWU Portal Release Facility does not provide the year-round release of water to the Eklutna River as is portrayed in Project documentation to date.

Author's Opinion. In the documentation to date for the AWWU Portal Release Facility, Eklutna Water Project facilities have not been represented correctly in terms of capacity and operation. The Eklutna Water Project should be considered a project of 70 mgd (108.5 cfs) capacity and the operation of EWP facilities must consider scheduled and emergency shutdowns that can last from a few days to many weeks. Adjustment for these considerations and more detailed and consistent engagement of AWWU and ADEC personnel must occur as soon as possible to ensure the long-term health and safety of the Anchorage Public Water System. As a result of the mistaken assumptions about the EWP, it is concluded that the proposed AWWU Portal Release Facility cannot provide adequate Eklutna River restoration flows nor can it provide year-round water without interruption. Thus, it is the Author's opinion that the AWWU Portal Release Facility as currently configured is fatally flawed and other Eklutna River Restoration alternatives, or additional complementary facilities, should be studied further.

END OF EXECUTIVE SUMMARY

PROJECT ISSUES PAPER
Eklutna River Restoration Project
GV Jones & Associates, Inc.
1200 E 76th Ave
Anchorage, AK 99518
Author: Donald Spiegel, P.E.
(February 14, 2024)

About the Author and the Author's Role:

Mr. Donald Spiegel has 45 years of experience on Water Supply and Water Treatment Engineering projects. He has a Bachelor's Degree and a Master's Degree in Environmental Engineering and has been involved with projects around the world with costs ranging from \$5M to almost \$5B. Mr. Spiegel was retained to review the concept of providing Eklutna Lake water to the Eklutna River from an AWWU Portal Release Facility from both engineering and operations viewpoints. Mr. Spiegel is uniquely qualified to serve in this role due to his experience in the planning, design, construction and operation of water supply projects but also based on his five years of experience as Project Engineer and Lead Field Engineer on the design, construction and startup of the Eklutna Water Project. Mr. Spiegel's review of Project documentation for the AWWU Portal Release Facility coupled with his historical knowledge of the Eklutna Water Project resulted in the identification of significant Project Issues as are detailed in this Project Issues Paper

Executive Summary -- Under Separate Cover

1. Introduction

The first Eklutna Hydroelectric Project was constructed in the late 1920's by Anchorage Light and Power Company. In 1950, the Federal Government, through the United States Bureau of Reclamation (USBR), proposed raising the original dam to create a larger lake that could provide more electric power to Southcentral Alaska. This Project, called the Eklutna Hydroelectric Project, was completed in 1955. In 1967 the Alaska Power Administration (APA) was established and all responsibility for the operation and maintenance of the Eklutna Hydroelectric Project was transferred from the USBR to APA. In 1991, the Federal Government agreed to sell its interest in the Eklutna Hydroelectric Project to a trio of local electric utilities: (1) Municipality of Anchorage dba as ML&P at a 53.33% share; (2) Chugach Electric Association at a 30.0% share; and (3) Matanuska Electric Association at a 16.67% share. As part of this 1991 Agreement, the new "Project Owners" agreed to develop and propose a program to protect, mitigate damages to, and enhance fish and wildlife impacted by the original Federal Hydroelectric Project. The program would necessitate the development of a year-round release of water to the Eklutna River. Ownership of the Eklutna Hydroelectric Project was officially transferred from the Federal Government to the new Project Owners on October 2, 1997.

The Project Owners have recognized that as the holder of significant water rights in the Eklutna Basin and as the operator of the existing hydroelectric facilities that substantially control the use and elevation of that water in Eklutna Lake, it is the responsibility of the Project Owners to provide water in the Eklutna River for the protection, mitigation and enhancement of fish and wildlife habitat. As a result, the Project Owners have committed to provide year-round instream flows to the Eklutna River.

2. Project Definition for the Eklutna River Release Facility

In 2019, the Project Owners began a consultation process to discuss alternatives for providing year-round release of water and periodic channel maintenance flows from Eklutna Lake into the Eklutna River. This resulted in three-years of effort to study alternatives and to consult with environmental stakeholders. The study began in March 2019 and continues today. The study's selected alternative consists of construction of a new isolation valve structure and a new river release structure located adjacent to the Anchorage Water and Wastewater Utility (AWWU) Eklutna Water Project (EWP) Portal Valve Shaft approximately one mile below the Eklutna Dam. This alternative, called the AWWU Portal Release Facility, relies on use of existing AWWU infrastructure. The selected alternative, however, creates policy and infrastructure issues for AWWU that are discussed herein.

AWWU owns, operates and maintains the EWP which supplies the Municipality of Anchorage (MOA) with approximately 90% of its drinking water. The EWP consists of raw water facilities (Lake Diversion Tunnel and Pipeline Segment P-4), the Eklutna Water Treatment Facility (EWTF), and treated water facilities (Clearwell and Pipeline Segments P-3, P-2 and P-1). Due to the location and elevation of the EWTF, high quality drinking water is supplied by gravity via 23 miles of treated water piping to the Anchorage Bowl. The hydraulic head from the treatment facility location pushes water as far South as Service High School and Potter Marsh in the Anchorage Bowl. There are turnouts along the treated water pipeline to the Anchorage Bowl for current and future drinking water supply to the Village of Eklutna, Joint Base Elmendorf & Richardson, and the communities of Peters Creek, Chugiak, Birchwood and Eagle River.

On the raw water portion of the EWP, the Portal Shaft is the terminus structure of the Lake Diversion Tunnel. The Lake Diversion Tunnel is approximately 8,600 feet long and six (6) feet in diameter and connects the original Eklutna Hydropower Plant tunnel to EWP Pipeline Segment P-4. The AWWU Portal Release Facility is proposed to be constructed immediately upstream of the EWP Portal Shaft. An isolation valve structure would be constructed, and a short section of existing piping would be replaced, to divert a portion of flow to the River Release Structure.

As presented for the AWWU Portal Release Facility alternative description, operation of the Eklutna River Release Facility is anticipated to be as follows:

- Normal Flow Release: Flow releases into the Eklutna River will vary seasonally with a winter flow of 27 cubic feet per second (cfs); which is equivalent to 17.5 million gallons per day (mgd) and a summer flow of 40 cfs (25.8 mgd) .
- Periodic Channel Maintenance Flow Release: Maintenance Flow releases will occur in 3 out of every 10 years and will require a maximum release of 80 cfs (51.6 mgd) from the Eklutna River Release Facility combined with additional release from the Eklutna Dam.

3. Governance

Overall governance; creating the framework for finance, contracting, construction, long-term operation and maintenance, and the resulting day-to-day decision making, for any project that uses water from a multipurpose lake or reservoir; can be complicated and onerous. This Eklutna Hydroelectric Project is no different. When year-round flows in the Eklutna River are realized, Eklutna Lake will be used as a source for: (1) public water system supply, (2) environmental protection, mitigation and enhancement, and (3) power production. Due to the potential of conflict over water appropriations and Project operations, particularly in dry years and during emergency events, governance for a project must be discussed and codified early. Governance can take the form of a Joint Powers Authority in which all of the interests have representation on a Governing Board but, at a minimum, a Memorandum of Understanding (MOU) between the

interests should be developed and signed to establish representation, decision making authorities and dispute resolution processes.

Ownership. To date, the Project Owners have been defined as MOA dba as ML&P, Chugach Electric and Matanuska Electric. These three Owner entities represent the power production interests for the Project. In addition to Owners, other stakeholders in this Project include Environmental and Water Supply interests. To date, several state and federal resource agencies and environmental organizations have been consulted to inform the Project's planning effort on issues related to the environmental protection, mitigation and enhancement progress of the Project. However, the water supply interests have had minimal involvement with the Project to date. This is evident from discussions and assumptions about the use of Eklutna Water Project facilities, especially with regards to future expansion and the certainty of scheduled and emergency shutdowns of EWP facilities.

Operations Philosophy. As part of any governance structure or MOU developed for operation of a **future river release facility**, it is imperative that an Operations Philosophy for Eklutna Lake be developed and agreed to by not only the Owner but also Environmental and Water Supply stakeholder interests as soon as possible. There is potential for conflict with Water Supply Stakeholders, especially with regards to future expansion of the EWTF, that must be discussed and resolved prior to the adoption of any Project alternative. In addition, scheduled shutdowns for inspection or repair of EWP infrastructure as well as emergency shutdowns will occur and have the potential to adversely impact the interests of Environmental stakeholders of the Project. Both of these issues are discussed further in Section 4 below.

Operations and Maintenance (O&M) Entity. It is important to agree on the O&M entity for any **future river release facility** as soon as possible. The O&M identity decision should be codified in the MOU and should be timed such that the selected O&M entity is part and parcel of the engineering planning, design and construction efforts that will precede its long-term O&M responsibilities.

PROJECT ISSUE # 1 is a Governance Issue – There is a need for a governance structure for ownership entities that requires regular engagement of all stakeholder parties with interests in the River Release Project: (1) Water Supply, (2) Environmental Protection, Mitigation and Enhancement, and (3) Power Production. The Project Owners only represent the power production interests for the Project. Information exchange and dialogue with State and Federal resource agencies and some environmental interests have also occurred but little engagement from the water supply interests (specifically AWWU, but also the Alaska Department of Environmental Conservation, ADEC) appear to have taken place. In the documentation to date, there is no mention of future expansion plans of the EWTF nor the certainty of inspection/maintenance shutdowns and emergency shutdowns of Eklutna Water Project facilities. In addition, there is no discussion of the present condition of the Intake Valve Shaft nor the Portal Valve Shaft which are both 35 years old. Expansion of the EWTF would severely limit the ability to divert water from the AWWU Portal Release Facility both in terms of time-of-year

and likely in flow. And shutdown of EWP facilities, which will continue to occur, would stop the flow to the Eklutna River entirely. If AWWU facilities are to be used as part of the solution for providing year-round flow to the Eklutna River, dialogue and engagement with AWWU and ADEC are critical to ensure the proper operation and long-term health and safety of the Anchorage Public Water System (PWS). ADEC will likely be interested in why a Public Water System is also being used as a River Restoration System.

4. Description of Eklutna Water Project Facilities

The EWP has supplied high quality drinking water to the community for over 35 years. The EWP was engineered and constructed between 1982 and 1988 with operations of the entire project commencing in the Summer of 1988. As stated earlier, AWWU owns, operates and maintains the EWP which supplies the MOA with approximately 90% of its drinking water. The EWP was planned such that high quality potable water produced by it could be distributed to the Anchorage Bowl by gravity without intermediate pumping. It also provides the ability to supply potable water to Eagle River and the Northern Communities between the treatment plant location and the Anchorage Bowl.

Intake. The EWP begins in Eklutna Lake with a shared intake facility. The intake provides water to both the EWP and the Eklutna Hydropower Plant. The intake structure itself is located near the north shore of the lake approximately one (1) mile east of the dam and is fed by an excavated inlet channel approximately 100 feet wide and 700 feet long. The excavated channel is at the lake bottom and leads to a reinforced concrete box structure, open and protected by trashracks on its top, front and both sides. The trashrack portion is about 23 feet wide by 20 feet high by 22 feet long. The overall length of the structure is about 42 feet. The structure invert elevation is about Elevation 794 and the top is at approximate Elevation 814. Two important items to be aware of for the Intake:

- It is important to maintain submergence on the intake structure top so as to not entrain air into the flow to the EWP or the Eklutna Hydropower Plant. Air in the flowstream must be vented properly and can be problematic for downstream facilities. The Eklutna Hydropower Plant currently operates to maintain a minimum lake elevation at approximate Elevation 820.
- At lower lake levels during late spring and early summer months (say late April early July), the intake structure itself is often visible from the North shore of the Lake illustrating how little submergence can be present at the structure.

Intake Valve Shaft. The EWP is connected to the pre-existing 9-foot diameter tunnel that feeds the Eklutna Hydropower Plant. To construct the water supply for the EWP, a section of the pre-existing tunnel was removed and a new steel tee was placed to allow diversion of a portion of the water from the Eklutna Hydropower Tunnel to the new EWP Tunnel. A short section of new tunnel piping was then installed as part of the EWP to route water from the new Tee section to an Intake Valve Shaft.

The Intake Valve Shaft is a circular structure from bottom invert elevation of approximately 786 to a top of cylinder elevation of 913. A square structure sits on top of the circular bottom and extends upward to approximate Elevation 930. The Intake Valve Shaft houses the following:

- Mainline steel piping, 54 inches in diameter.
- Mainline Emergency Shutoff Valve (Ring Follower Valve with hydraulic operator) – in an emergency condition this valve can shutdown the entire downstream EWP.
- Mainline Isolation Valve (Butterfly Valve with hydraulic operator) – during normal operation, this valve can shutdown the entire downstream EWP.
- Smaller bypass piping and valving that allows the piping downstream of the above two mainline valves to be refilled from the upstream tunnel connection in a controlled and proper manner.
- Sump pump system including a sump pump discharge into the 54" mainline pipe.
- Pressure sensing lines upstream and downstream of the Ring Follower Valve to ensure informed operation of Eklutna Water Project facilities.
- Emergency high flow meter and transmitter which can alert Eklutna operations to a downstream pipeline break and can be used to shutdown flow to the downstream EWP. The signal from this meter is alarmed and monitored closely by operators at the EWTF.
- Intake Valve Shaft Flood Alarm which can alert operators at the EWTF to a pipeline break within the Intake Valve Shaft or myriad possible structural or mechanical problems at the Intake Valve Shaft. Water inside the Intake Valve Shaft can match Eklutna Lake level depending on the physical alarm condition.
- All electrical and other instrumentation (such as Eklutna Hydropower Tunnel Pressure, ventilation status, etc.) necessary for the proper operation and remote monitoring of the Intake Valve Shaft.

Two important items to be aware of for the Intake Valve Shaft:

- There are at least sixteen smaller pipe connections to the mainline 54" pipe and valves; many of those connections have corrosion present and may not have been operated for some time. All of the mechanical, electrical and instrumentation items listed above require periodic maintenance and inspection which often requires scheduled shutdown of the EWP that can last days, weeks, or longer depending on the maintenance needs. Draining and refilling time must be considered in all maintenance shutdowns. It is imperative that a Condition Assessment be performed and required maintenance activities identified and conducted for all mechanical, electrical, and instrumentation items in the Intake Valve Shaft as part of the Portal Release Facility work. It must be understood that use of the AWWU Portal Release Facility to provide year-round water to the Eklutna River is not a 100% certain water supply as periodic maintenance shutdowns will continue to occur.
- The Intake Valve Shaft has mechanical equipment, electrical supply and instrumentation and controls that shutdown the entire EWP under emergency conditions. An emergency

condition could manifest as a result of a major earthquake, failed downstream infrastructure, terrorism or vandalism attacks or simple error when working on electrical and instrumentation circuits. Emergency shutdowns have occurred in the past and will occur again in the future. Again, it must be understood that use of the AWWU Portal Release Facility to provide year-round water to the Eklutna River is not a 100% certain water supply as emergency shutdowns will continue to occur.

Lake Diversion Tunnel. Downstream of the Intake Valve Shaft is the Lake Diversion Tunnel which is approximately 8600 feet long and six (6) feet in diameter. The interior was inspected via robotic camera within the past few years and was found to be in good condition. Similar future inspections will be required. The inspections require that the EWP be shutdown and drained to allow entry of the robotic camera and to not distort the video recording.

As with the Intake Valve Shaft, it must be understood that use of the AWWU Portal Release Facility to provide year-round water to the Eklutna River is not a 100% certain water supply as periodic inspection shutdowns of the Lake Diversion Tunnel will continue to occur.

Portal Valve Shaft. The Lake Diversion Tunnel ends at the Portal Valve Shaft. The Portal Valve Shaft is a rectangular structure from bottom invert elevation of approximately 776 to a top of elevation of approximately 811. The Portal Valve Shaft houses the following:

- Mainline steel piping, 54 inches in diameter
- Mainline Isolation Valve (Butterfly Valve with hydraulic operator) – during normal operation, this valve can shutdown the entire downstream EWP.
- Smaller bypass piping and valving that allows the piping downstream of the above mainline isolation valve to be refilled from the upstream Lake Diversion Tunnel in a controlled and proper manner.
- Sump pump system including a sump pump discharge into the 54" mainline pipe.
- Emergency high flow meter and transmitter which can alert the operators at the EWTF to a downstream pipeline break and can be used to shutdown flow to the downstream EWP. The signal from this meter is alarmed and closely monitored by operators at the EWTF.
- Portal Valve Shaft Flood Alarm which can alert operators at the EWTF to a pipeline break within the Portal Valve Shaft or myriad possible structural or mechanical problems at the Portal Valve Shaft.
- All electrical and other instrumentation (such as Lake Diversion Tunnel Pressure, ventilation status, etc.) necessary for the proper operation and remote monitoring of the Portal Valve Shaft.

Two important items to be aware of for the Portal Valve Shaft:

- There are at least eight smaller pipe connections to the mainline 54" pipe and valve; many of those connections have corrosion present and may not have been operated for some time. All of the mechanical, electrical and instrumentation items listed above require periodic maintenance which often requires scheduled shutdown of the EWP that can last

days, weeks, or longer depending on the maintenance needs. Draining and refilling time must be considered in all maintenance shutdowns. It is imperative that a Condition Assessment be performed and required maintenance activities identified and conducted for all mechanical, electrical, and instrumentation items in the Portal Valve Shaft as part of the Portal Release Facility work. It must be understood that use of the AWWU Portal Release Facility to provide year-round water to the Eklutna River is not a 100% certain water supply as periodic maintenance shutdowns will continue to occur.

- The Portal Valve Shaft has mechanical equipment, electrical supply and instrumentation and controls that shutdown the entire EWP under emergency conditions. An emergency condition could manifest as a result of a major earthquake, failed downstream infrastructure, terrorism or vandalism attacks or simple error when working on electrical and instrumentation circuits. Emergency shutdowns have occurred in the past and will occur again in the future. Again, it must be understood that use of the AWWU Portal Release Facility to provide year-round water to the Eklutna River is not a 100% certain water supply as emergency shutdowns will continue to occur.

Raw Water Pipeline (P-4). Raw Water Pipeline Segment P-4 extends from the Portal Valve Shaft to the Eklutna Energy Recovery Station located on the EWTF site. The pipeline is approximately 6.2 miles in length and is routed in the Eklutna River Valley, exiting the river valley on a fairly steep incline to a plateau that is approximately 3,000 feet east of the EWTF site. Approximately 52% of the Segment P-4 pipeline is 60 inches in diameter with approximately 48% at 54 inches in diameter. An Air-Vacuum and Air-Release Valve Vault is located on the top plateau near the treatment facility at the high point of the Segment P-4 pipeline. The Air-Vacuum and Air Release assembly requires a water elevation of approximately Elevation 730 to have the float seat properly with no chatter. As discussed in Sections 4 and 5 below, the impact of the AWWU Portal Release facility on downstream EWP piping and facilities has not been discussed in any AWWU Portal Release Facility documentation to date.

Eklutna Energy Recovery Station. The Eklutna Energy Recovery Station (EERS), located on the EWTF site, serves as the pressure and flow control structure for the downstream EWTF. The EERS houses a hydraulic turbine/electric generator that recovers energy from the water flow from the lake. The turbine was sized to recover the energy at lower plant flows; up to about 41 mgd – which is equal to 63.5 cfs. Higher flows were observed during start-up and plant testing but the turbine is nameplated at 41 mgd. Adjacent to the turbine in the EERS is a full capacity sleeve valve capable of supplying 70 mgd (108.5 cfs) – to the downstream treatment facility. The EERS and the downstream EWTF were designed to be easily expanded from its original treatment capacity of 35 mgd (54.25 cfs) to an expanded future capacity of 70 mgd (108.5 cfs). At 70 mgd, the turbine would still run at 41 mgd and the sleeve valve would run at the difference of 29 mgd. Should the turbine be out of service for any reason, then the sleeve valve would operate at the full 70 mgd. All mechanical, electrical and instrumentation and control systems are in place today to allow operation of the EERS at 70 mgd.

Eklutna Water Treatment Facility. The limiting factor for operation of the EWP at a continuous flow of 70 mgd is the treatment process capacity at the EWTF. The EWTF was designed originally for a treatment capacity of 35 mgd to more closely match the PWS demands at the time of construction. The original design of the facility, however, provided the means to easily and inexpensively double the capacity when needed in the future. Some of the features designed and constructed in the 1980's for later use at the time of expansion are as follows:

- Raw Water System (all the facilities described above) were designed and constructed for a flow of 70 mgd. The EERS was designed to preferentially use the hydraulic turbine for energy recovery while also providing a secondary water passage with a sleeve valve. The sleeve valve can either add water to the turbine flow for future conditions or serve as a full flow bypass of the turbine. Section 5 below discusses the hydraulic design of the raw water system.
- The EWTF was designed and constructed with easy expansion in mind as follows:
 - Hydraulic channels have knock-out panels to allow easy connection of future hydraulic channels
 - Personnel access corridors have knock-out panels to allow easy connection of future personnel access corridors
 - Concrete joints have protected structural dowels and waterstop where future concrete structures will adjoin.
 - Process piping was extended and valved/capped for connection to future unit processes
 - All chemical storage spaces were designed for a plant flow of 70 mgd
 - Waste stream handling for waste filter backwash water was sized for a plant flow of 70 mgd, including recycle pumping
 - Waste stream handling for sedimentation basin solids was sized for a plant flow of 70 mgd, including recycle pumping.
 - The Treated Water Clearwell (treated water storage) located on the EWTF site was sized to accommodate a plant flow of 70 mgd. The Clearwell capacity is 15 million gallons and is well within industry norms for the future 70 mgd treatment facility capacity.
- The treated water system, the piping system from the treatment facility that parallels the Glenn Highway and enters the Anchorage Bowl adjacent to the Ship Creek Water Treatment Facility, is sized for 70 mgd. Treated Water Pipeline Segments P-3, P-2 and P-1 were sized to flow a total of about 25 to 30 mgd to the Village of Eklutna, Joint Base Elmendorf & Richardson, and the Northern Communities of Peters Creek, Chugiak, Birchwood and Eagle River. The remaining flow of 40 to 45 mgd is the flow available for use in the Anchorage Bowl.

PROJECT ISSUE #2 is an Opportunity Cost Issue. The EWP was originally designed and constructed to serve a PWS demand of 70 mgd (108.5 cfs). The EWP piping, both raw water and treated water, were designed and constructed for the 70 mgd system flow; the EWTF was

designed and constructed for a plant flow of 35 mgd to more closely match the PWS demands at the time of construction. The EWTF, however, was designed and is configured to allow easy expansion to 70 mgd. No mention of the future expansion of the EWTF to 70 mgd is acknowledged in the AWWU Portal Release Facility documentation to date. The need to expand the EWTF in the future could occur for a number of reasons, including: (1) population increase particularly North of the Anchorage Bowl; (2) diminishing groundwater supply due to contamination from PFAS, de-icing compounds, arsenic and/or other contaminants; and (3) possible decrease in Ship Creek supply due to water rights issues and creek flows during certain times of the year (military and maintaining minimum creek flows have priority over the AWWU use). To forego the opportunity to expand the EWTF to 70 mgd, and thus to forego expansion of the AWWU PWS in the planned manner that has existed for over 30 years, must be considered a significant policy decision for the MOA. To supply future drinking water from a source other than Eklutna Lake would certainly increase the cost of water in Anchorage significantly in the future.

It should be noted that if the EWP retains its originally planned 70 mgd (108.5 cfs) capacity, the flow releases from the AWWU Portal Release Facility may not accommodate the stated operational flows for the facility:

- Normal Flow Release: Flow releases into the Eklutna River will vary seasonally with a winter flow of 27 cfs and a summer flow of 40 cfs. **The 40 cfs flow in summer may not be available depending on lake level. Currently Eklutna Lake is operated below Elevation 850 during spring and most summer months which coincides with high water demands in the AWWU system. The original hydraulic design condition for the EWP provides 70 mgd of flow to the EWTF at the low lake level of Elevation 820. If additional water is released from the Portal Release Facility with lake Elevation at 820, it is likely that the EWTF cannot receive its 70 mgd design capacity. As lake levels increase from Elevation 820, some water can be provided by the Portal Release Facility. System hydraulics must be evaluated at 70 mgd to fully determine the flows available at the Portal Release Facility at varying lake levels with due consideration of the air/vacuum system at the high point along the P-4 pipeline.**
- Periodic Channel Maintenance Flow Release: Maintenance Flow releases will occur in 3 out of every 10 years and will require a maximum release of 80 cfs from the Eklutna River Release Facility combined with additional release from the Eklutna Dam. **The 80 cfs flow cannot be accommodated if the EWP is operating at 70 mgd (108.5 cfs).**

PROJECT ISSUES #3 (Scheduled Maintenance) and #4 (Emergency Maintenance) are Public Relations Issues. The EWP raw water facilities, including the Intake Valve Shaft and the Portal Valve Shaft have mechanical, electrical, and instrumentation and control equipment that require periodic maintenance work that necessitates scheduled shutdown of the EWP. These scheduled shutdowns can last days or longer depending on the maintenance needs. In addition, the raw water facilities have automatic and manual emergency shutdown capabilities in case of damage due to earthquake, terrorism, or vandalism that also result in long outage

times. Draining and refilling raw water facilities can add significant time to these shutdowns, whether scheduled or emergency. It must be understood that use of the AWWU Portal Release Facility does not provide a 100% certain year-round water supply to the Eklutna River. Scheduled maintenance shutdowns as well as periodic emergency shutdowns will continue to occur and discharge of water to the Eklutna River during these events will stop. The impact to fish spawning habitat and the fish population itself will be of major public interest, potentially manifesting as negative public opinion towards MOA in general and AWWU specifically. Simply stated, the AWWU Portal Release Facility may not be sufficient to provide the year-round release of water to the Eklutna River as is portrayed in Project documentation to date.

5. Eklutna Water Project Raw Water System Hydraulics

For conversations going forward concerning the AWWU Portal Release Facility, it is important to have an understanding of the raw water system hydraulics from Eklutna Lake to the EERS located on the EWTF site. As stated above, the EWP was designed and constructed as a 70 mgd water supply. The EWTF was designed and constructed at 35 mgd, with capability for easy and economical expansion to 70 mgd in the future. The raw water system, consisting of the Lake Diversion Tunnel, Pipeline Segment P-4 and the EERS was designed for a system flow of 70 mgd to match the future expanded treatment facility capacity.

Critical elevations considered in the original hydraulic design of the raw water system were: (1) Eklutna Lake Level (assumed to be Elevation 850 as average level and Elevation 820 as low level); and (2) the hydraulic grade line at the Air-Vacuum and Air Release Valve Vault on Pipeline Segment P-4 (required to be approximate Elevation 730). The hydraulic headloss between the Intake Valve Shaft and the Air-Vacuum and Air Release Vault is approximately 80 feet at a flow of 70 mgd. This allows the 70 mgd flow to barely satisfy the needs of the Air-Vacuum and Air Release Facility on Pipeline Segment P-4 when Lake Level is Elevation 820. Any additional headloss in the system created by flows for the AWWU Portal Release Facility at low Eklutna Lake levels could be problematic for EWTF operations. As Eklutna Lake levels increase above the assumed low level of Elevation 820, more water becomes available for release at the AWWU Portal Release Facility but it will not be in accordance with the stated operational flows for Eklutna River Restoration Project and the releases could be intermittent depending on hydrologic conditions.

PROJECT ISSUES – See Project Issues # 2, 3 and 4 in Section 4 above.

6. Review of Eklutna River Release Facilities

In a quick review of the concept design for the AWWU Portal Release Facility, some items to consider are:

- Replacement Piping at the Lake Diversion Tunnel connection will take some time to construct and will require shutdown of the EWP. The pipeline segment that would be removed is set in concrete slurry as bedding and would require additional time and effort to remove.

- Redundant Energy Dissipating Valves (Sleeve Valves) should be provided to ensure uninterrupted flow to the river should this AWWU Portal Release Facility alternative move forward.
- Electrical Supply at the Portal Facility is single phase, the sleeve valve actuators must be coordinated for this and may need to have DC actuators with battery supply for emergency closing. The controls for the valves should establish a control loop whereby desired flow and actual flow are compared and adjusted as necessary.
- Instrumentation and Control; SCADA Communications. Valve position, valve control, upstream pressure and discharge flow must be communicated back to the EWTF so the operators understand what is occurring on the raw water system.

PROJECT ISSUES – See Project Issue #1 in Section 3 above. A governance structure necessitating involvement of AWWU Operations and Engineering staff is critical for the success of the River Restoration Project and to ensure operation of any facility that connects to the EWP does not impact the supply of potable water to the PWS. The comments above are illustrative of the type of comments that should be expected from any review of facilities that connect to the existing PWS.

END OF PROJECT ISSUES PAPER



ASSEMBLY LEADERSHIP

CHRISTOPHER CONSTANT | CHAIR
MEG ZALETEL | VICE CHAIR

February 16, 2024
sent via email

Dear Eklutna Hydroelectric Program Development Team,

Please accept this resolution, AR No. 2024-40, As Amended, as the Anchorage Assembly's public comments on the Draft Fish and Wildlife Program for the Eklutna Hydroelectric Project. AR No. 2024-40 was amended and approved by the Anchorage Assembly on February 2, 2024.

Sincerely,

Assembly Chair Christopher Constant
District 1, North Anchorage

Assembly Vice Chair Meg Zaletel
District 4, Midtown

Attachment: AR No. 2024-40, As Amended

Municipal Clerk's Office
Amended and Approved
Date: February 2, 2024

Submitted by: Assembly Vice Chair Zaletel
Assembly Chair Constant
Assembly Member Kevin Cross
Prepared by: Legislative Services
Reviewed by: Assembly Counsel's Office
For reading: February 2, 2024

ANCHORAGE, ALASKA
AR No. 2024-40, As Amended

**A RESOLUTION OF THE ANCHORAGE ASSEMBLY SUBMITTING PUBLIC
COMMENT ON THE DRAFT FISH AND WILDLIFE PROGRAM FOR THE
EKLUTNA HYDROELECTRIC PROJECT.**

WHEREAS, the Municipality of Anchorage, Chugach Electric Association (CEA), and Matanuska Electric Association (MEA) (collectively “the Hydroelectric Project Owners”) jointly own the Eklutna Hydroelectric Project and are parties to the 1991 Fish and Wildlife Agreement (the “1991 Agreement”) with the State of Alaska, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service (an agreement that notably excludes a key stakeholder, the Native Village of Eklutna, the federally recognized tribe whose ancestral homelands encompass this project) to fund studies to examine and quantify the impacts of the Eklutna Power Project on fish and wildlife; examine and develop proposals for the protection, mitigation, and enhancement of fish and wildlife affected by such hydroelectric development; and prepare a Proposed Final Fish and Wildlife Program (the “Fish and Wildlife Program”) for approval by the Governor; and

WHEREAS, once approved by the Governor, the Fish and Wildlife Program will contractually bind operations of the Eklutna Hydroelectric Project and Anchorage Water and Wastewater Utility (“AWWU”) for the next 35 years; and

WHEREAS, in their Draft Fish and Wildlife Program to mitigate their impacts to fish and wildlife pursuant to the 1991 Agreement, the Hydroelectric Project Owners propose to utilize AWWU infrastructure to deliver water into the Eklutna River via a Portal Valve (the “Portal Valve Alternative”) one mile downstream of Eklutna Lake; and

WHEREAS, the policy of the Municipality of Anchorage has been to support restoration of the Eklutna River since the Anchorage Assembly adopted AR 2017-324(S), “A Resolution in Support of Efforts to Restore the Eklutna River,” and AR 2022–262, As Amended, “A Resolution of the Anchorage Municipal Assembly in Support of Efforts to Restore the Eklutna River”; and

WHEREAS, further, through the passage of AO 2023-131, As Amended, the Assembly, through the creation of a specific law, reinforced and declared that it is the official policy of the Municipality of Anchorage, inclusive of the Anchorage Hydropower Utility Department, to restore the continuous water flow of the Eklutna River and the fish populations of the River and Eklutna Lake, to the greatest extent possible, subject to all provisions of the 1991 Agreement; and

1 **WHEREAS**, any changes to the Eklutna Hydroelectric Project will impact not only
2 hydroelectric power and drinking water, but also fish and wildlife; and
3

4 **WHEREAS**, Eklutna Lake is the primary source of Municipality's drinking water for
5 which AWWU currently pays approximately \$1.2 Million annually to the Eklutna
6 Hydroelectric Project to ensure access to the Municipality's drinking water and any
7 binding agreement relating to the purchase price of water and volumes available to
8 AWWU may impact property rights of AWWU and the regulated price of water to its
9 customers; and
10

11 **WHEREAS**, the Anchorage Assembly was recently briefed about the changing
12 regulatory environment for drinking water, and while the effects of the regulatory
13 changes are currently unknown, concern has been raised about the availability of
14 drinking water from ground wells under the new regulations; and
15

16 **WHEREAS**, the Anchorage Assembly hired an expert engineer, Don Spiegel, who
17 originally designed the Eklutna AWWU system, to evaluate the Portal Valve
18 alternative as it relates to AWWU's operation of the Eklutna Water Treatment Facility
19 and the effectiveness of the Portal Valve Alternative in delivering water to the river
20 to support the restoration of fish species; and
21

22 **WHEREAS**, the initial conclusions of Mr. Spiegel, which were submitted to the
23 Assembly through AIM 2024-11 on January 23, 2024, raise significant doubts as to
24 whether the Portal Valve Alternative will meet the mitigation objectives stated on a
25 year round basis: inability to meet those objectives could result in AWWU and the
26 Municipality being culpable and liable for the death of any in-river species that have
27 returned, depending on water levels provided by the Hydroelectric Project Owners,
28 and could be a limiting condition for AWWU expansion in the future; and
29

30 **WHEREAS**, the public comment period for the Draft Fish and Wildlife Program is
31 open until February 19, 2024; and
32

33 **WHEREAS**, following the public comment period is an opportunity for the
34 Hydroelectric Project Owners to review the comments and resolve any
35 disagreements prior to submitting a final proposal to the Governor; and
36

37 **WHEREAS**, the Native Village of Eklutna has put forward an alternative for removal
38 of the dam at Eklutna Lake, which is supported by the Municipal policy stated in AO
39 2023-131, As Amended, and codified at AMC 26.30.025A., but was never fully
40 considered by the Hydroelectric Project Owners and has not been presented as an
41 alternative in the Draft Fish and Wildlife Program; and
42

43 **WHEREAS**, in addition to the stated policy and support for dam removal, the
44 Anchorage Assembly has evaluated the Portal Valve Alternative and has concerns
45 about that alternative; and
46

47 **WHEREAS**, in the interest of protecting the future of the Municipal water supply as
48 well as the interests of its residents and municipal taxpayers, the Anchorage
49 Assembly submits the following public comments on the Draft Fish and Wildlife
50 Program regarding the Portal Valve Alternative;

1
2 **NOW, THEREFORE, THE ANCHORAGE ASSEMBLY RESOLVES and submits**
3 **the following as its comments on the Draft Fish and Wildlife Program:**
4

5 **Section 1.** The following are process and technical concerns particular to the
6 Portal Valve Alternative put forward by the Hydroelectric Project Owners for public
7 comment:
8

9 A. **Non-Compliant Process.** The August 7, 1991 Fish and Wildlife
10 Agreement (1991 Agreement) sets forth a process for addressing the
11 Eklutna Hydroelectric Project's impacts on fish and wildlife similar to
12 that for Federal Energy Regulatory Commission ("FERC") licensed
13 projects. The process set forth in the 1991 Agreement was intended
14 to be at least as robust as a normal FERC license process, which is
15 subject to all the provisions of National Environmental Policy Act
16 ("NEPA") and all the authorities typically granted to the federal
17 agencies. The process engaged by the Hydroelectric Project Owners
18 falls short of the FERC standard of analysis. No NEPA analysis was
19 done, the federal agencies were denied the authorities they normally
20 would have, such as to prescribe fish passage, and the public wasn't
21 presented any alternatives to choose from. Moreover, the process
22 engaged in does not appear comparable to the NEPA requirements to
23 consult with Native Tribes impacted by the project (18 C.F.R. 5.7), nor
24 have a dispute resolution process allowing agencies to mandate
25 conditions (18 C.F.R. 5.8 and 5.15).
26

27 None of state or federal signatories to the 1991 Agreement have so
28 far supported the Portal Valve Alternative. The comment letters from
29 these state and federal resource agencies raise questions around the
30 process engaged by the Hydroelectric Project Owners, the data inputs
31 used in modeling to develop the Draft Fish and Wildlife Program, and
32 the viability of the Portal Valve Alternative to achieve the stated goals
33 of the 1991 Agreement. These questions are unresolved.
34

35 Similarly, the process under the 1991 Agreement diverges
36 substantially from the type of alternatives analysis the Municipality
37 uses on its own capital projects. Often the Municipality's own large
38 capital projects, such as the Port of Alaska Modernization Program
39 ("PAMP") or projects co-funded through the Anchorage Metropolitan
40 Area Transportation Solutions ("AMATS") design alternatives, are
41 evaluated by experts and relevant stakeholders and the Assembly is
42 briefed and able to weigh in on the proposed alternatives, particularly
43 where Municipal resources are required to fund the projects. Based
44 on the information the Assembly has been provided to date, only one
45 alternative was seriously evaluated by the Hydroelectric Project
46 Owners and put forward for consideration even though a Municipal
47 contribution is expected through a property tax assessment.
48

49 B. **Potential Impacts to Anchorage Drinking Water .** Throughout this
50 process, there has been very little discussion about any implications

on AWWU and the Municipality's access to drinking water now and into the foreseeable future (the next 35 years). The week of January 22, 2024, well after the Draft Fish and Wildlife Program was released and after years of discussion and presentation by the Eklutna Hydroelectric Project owners, we learned that the Hydroelectric Project Owners and AWWU, all public utilities regulated by the Regulatory Commission of Alaska (RCA), had signed a binding agreement in early October 2023, prior to submitting the Draft Fish and Wildlife Program for public comment. We learned this agreement is based on the Portal Valve Alternative and no other alternative; an alternative that may have significant impacts to the project outcome as well as to regulated rates authorized by the RCA. The Anchorage Assembly has requested a copy of the signed agreement, but we have been told the agreement is confidential and **could only review it in Executive Session** ~~[we therefore have been unable to review it.]~~ This is a significant hinderance on the Anchorage Assembly, and the public, to provide complete comments on the Portal Valve Alternative as related to AWWU operations, potential impacts to Municipal growth and strategic investments for AWWU and the Municipality. Significant legal questions also remain whether a binding agreement can be signed relating to future Municipal utility assets, revenues, and expenditures without Assembly approval.

Before learning of that agreement, the Anchorage Assembly hired an expert to analyze the effectiveness of the Portal Valve option in relation to AWWU's operation at Eklutna. That analysis by engineer Don Spiegel, who designed the Eklutna AWWU system, concluded that the Portal Valve "cannot provide adequate Eklutna River restoration flows, nor can it provide year-round water without interruption. Thus, it is the Author's opinion that the Portal Valve as currently configured is fatally flawed and other Eklutna River restoration alternatives should be studied further."

Furthermore, in the past month, AWWU has briefed the Assembly on new developments concerning drinking water regulation through federal and local entities. The impacts of the new drinking water regulations are yet to be determined, but AWWU leadership has expressed concerns about potential impacts to the Municipality from limitations of retaining full ground well capacity. Until the new regulatory landscape is better understood, particularly any reductions in access to drinking water from sources other than Eklutna, any future limitations on drinking water capacity at Eklutna should be held in abeyance.

- C. **Incomplete Analysis and Insufficient Mitigation.** The Portal Valve Alternative does not meet the requirements of the 1991 Agreement regarding "the protection, mitigation of damages to, and enhancement of fish and wildlife affected by hydroelectric development of the Eklutna Hydroelectric Project." There are a number of variables related to lake level that can render the Portal Valve Alternative

1 inoperable. Additionally, regular and unexpected maintenance at the
2 AWWU water facility will also stop the flow of water into the Portal
3 Valve. Discontinuous water flows will result in fish kills in Eklutna
4 River. The state and federal signatories to the 1991 Agreement have
5 raised questions about the analysis and process used to develop the
6 Draft Fish and Wildlife Program. The Hydroelectric Project Owners
7 failed to consider all reasonable alternatives, including the dam
8 removal alternative proposed by the Native Village of Eklutna. The
9 Hydroelectric Project Owners failed to present the public with a full
10 range of alternatives as would typically occur in similar situations.
11

- 12 D. **Poor Coordination and Questionable Use of Public Funds.** The
13 Hydroelectric Project Owners and AWWU are regulated utilities and
14 need to demonstrate benefit to their rate payers. Additionally, the
15 Assembly, as the steward of taxpayer funds, must demonstrate benefit
16 to the residents of the Municipality through the expenditure of public
17 funds. Treating the Portal Valve Alternative as a singular stand-alone
18 project is short sighted and does not maximize various opportunities
19 to meet the goals and objectives of 1991 Agreement across various
20 entities nor does it meet the requirements of these entities to benefit
21 the public. The Portal Valve Alternative brought forward by the
22 Hydroelectric Project Owners is self-serving and fails to protect the
23 broader public interests of the Municipality of Anchorage. Given the
24 \$57 million price tag of the Portal Valve Alternative, its potential
25 impacts to AWWU operations, and the financial implications to
26 ratepayers and taxpayers for the next 35 years, we find this is a poor
27 use of public funds and lacked public coordination.
28

29 **For all the above reasons, the Anchorage Assembly cannot endorse**
30 **and thus opposes the Draft Fish and Wildlife Program.**
31

32 **Section 2.** The Municipality of Anchorage does not intend to issue
33 authorizations or provide funds or any other form of support of the Draft Fish and
34 Wildlife Program or any alternative that doesn't restore the full length of the Eklutna
35 River and comply with policy of the Municipality, as recently enacted by AO 2023-
36 131, As Amended, and codified at AMC 26.30.025A., as well as AR 2022-262, As
37 Amended, and AR 2017-324(S).
38

39 **Section 3.** The Regulatory Commission of Alaska (RCA), under its statutory
40 powers to initiate investigation into practices and facilities of a public utility, should
41 review the Draft Fish and Wildlife Program and examine any impacts on any of the
42 regulated utilities, including but not limited Chugach Electric, Matanuska Electric,
43 Anchorage Hydropower and AWWU, particularly about impacts to rate payers and
44 their access to uninterrupted service, **before** any option for a Final Fish and Wildlife
45 Program is transmitted to the Governor for review and approval.
46

47 **Section 4.** The Anchorage Assembly requests the Hydroelectric Project Owners
48 to seek a two-year extension of the 1991 Agreement from the signatories, of which
49 the Municipality is one through the Anchorage Hydropower Utility, to perform
50 additional analysis, consultation, and coordination with affected parties, including

the Anchorage Assembly and the Native Village of Eklutna. The issues at play are too significant to our community to rush to judgment or exclude key stakeholders. The residents of the Municipality deserve a measured and comprehensive approach guided by respectful coordination to reach a solution that enjoys broad consensus among the affected parties.

Section 5. This resolution shall be effective immediately upon passage and approval by the Assembly.

PASSED AND APPROVED by the Anchorage Assembly this 2nd day of February, 2024.

ATTEST:



Chair



Municipal Clerk



February 18, 2023

Submitted via Email

Samantha Owen
Senior Regulatory Consultant
McMillen Inc.
2607 Western Ave, Unit 360
Seattle, WA 98121

Re: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

Dear Ms. Owen:

The Center for Biological Diversity (“Center”) provides the following comments on the Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage (“Project Owners”)’s Eklutna Hydroelectric Project Draft Fish and Wildlife Program (“Draft Program”).¹

I. Purpose and Scope of the 1991 Fish and Wildlife Agreement

The purpose of the 1991 Eklutna Fish and Wildlife Agreement (“1991 Agreement”) and the resultant Fish and Wildlife Program is to develop and implement measures to “protect, mitigate damages to, and enhance fish and wildlife (including related spawning grounds and habitat)” from the harms of the Eklutna Hydroelectric Project (“Project”).² Currently, no water spills over the Eklutna Lake dam down the river except during floods. A 4.5-mile bypass tunnel diverts water from the lake to the power plant. Of the water diverted, 90% is diverted to the Knik River for hydropower, while 10% is diverted for Anchorage drinking and wastewater, effectively blocking the remaining 14 miles of Eklutna River from its water source.³ The scope of the protection, mitigation, and enhancement requirements must include the entire Eklutna watershed, given the Project’s substantial impacts to the flow of water, nutrients, sediment, fish, and wildlife, and more up and down the river, effecting the entire ecosystem far beyond the limited river corridor.⁴ The Department of Energy’s Environmental Assessment (“EA”) for the Eklutna Purchase Agreement states that “[d]uring reviews of the legislative proposal, loss of a sockeye

¹ Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage (“Project Owners”), Eklutna Hydroelectric Project Draft Fish and Wildlife Program (Oct. 27, 2023).

² Fish and Wildlife Agreement Snettisham and Eklutna Projects at 1 (Aug. 7, 1991); *See also* Eklutna Draft Fish and Wildlife Program at 45; *See also* Alaska Power Administration Asset Sale and Termination, Pub. L. 104-58, title I § 104(a)(2) (Nov. 28 1995).

³ Native Village of Eklutna, “Eklutna River: Ildlughetnu” (accessed Nov. 17, 2023); *see also*, Kleinschmidt Associates, Draft Instream Flow Technical Memo at 2 (Sept. 28, 2022) (“In 1955, the federal government completed construction of a new hydropower project and in 1964 a new storage dam which effectively eliminated any flow releases from Eklutna Lake to the Eklutna River.”); *see also*, Trout Unlimited, Eklutna River Workshop: Summary of Outcomes, Recommendations, and Future Needs (Jun. 2018).

⁴ *See*, EPA WATERS GeoViewer 2.0 (accessed Feb. 18, 2024) <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=074cfede236341b6a1e03779c2bd0692>.

salmon run that once spawned in Eklutna Lake was identified [...]. 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.”⁵ This shows that at minimum, the Fish and Wildlife Program must address reconnecting the lower river to the lake and upper tributaries. Moreover, since the lower diversion dam was removed in 2018, the Project’s continued diversion of all controllable flow at Eklutna Lake and the complete disconnection of the river to the lake and upper tributaries are, and will continue to be, the primary causes for ongoing degradation of fish and wildlife habitat in the Eklutna River system. The Divestiture Report notes that the Agreement’s fish and wildlife measures were intended to “work at least as well as Federal regulation for the intended purpose of mitigation and enhancement of affected fish and wildlife resources,” and were to be “quite similar to that under the [Federal Energy Regulatory Commission (“FERC”)] licensing” process for hydroelectric projects.⁶

II. The Draft Program Analysis is Incomplete, Flawed, and Otherwise Insufficient for a Decision under the Agreement

A. The Draft Program Does Not Meet the Purpose of the Agreement

The AWWU Portal Valve alternative proposed in the Draft Program by the Project Owners leaves Eklutna Lake and upper tributary streams completely disconnected from the lower Eklutna River, maintaining over a mile of dry streambed.⁷ The flows the Project Owners propose to release from the AWWU Portal are the minimum flows considered by any of the Parties to the 1991 Agreement during the Agreement study process, with small high-flow events in only three out of every ten years.⁸ The Draft Program provides no solution for the complete blockage of salmon reaching the extensive lake spawning habitat required by sockeye salmon and 15 miles of upper tributaries spawning habitat above the lake that is highly amenable to Chinook and coho salmon completely stranded.⁹ Without a connection to Eklutna Lake and upper tributaries, mitigating and enhancing the disconnection and damage to those key spawning and rearing grounds and habitat is impossible. The Project Owners admit in the Draft Program that “no change in sockeye rearing habitat is anticipated.”¹⁰ The proposed nominal flow releases from the AWWU Portal will only minimally enhance Chinook and coho salmon and their habitat in the lower Eklutna River, including side channel and off-channel habitat. None of the federal and state fish and wildlife agencies consider the Draft Program to adequately meet the requirements of the 1991 Agreement.¹¹

⁵Divestiture Summary Report, Sale of Eklutna and Snettisham Hydroelectric Projects at 19 (Apr. 1992).

⁶ *Id.* at 20, 18.

⁷ Eklutna Draft Fish and Wildlife Program at 46-56.

⁸ *Id.* at 39.

⁹ See, e.g., Native Village of Eklutna, Eklutna Lake and Tributaries Salmon Habitat (2024); See also McMillian Jacobs Associates, Eklutna Lake Aquatic Habitat and Fish Utilization, Year 2 Study Report Draft (2023); See also Native Village of Eklutna, TWG 2021-2022 Final Report (2023).

¹⁰ Eklutna Draft Fish and Wildlife Program at Appendix B-4.

¹¹ See, USFWS, Draft Fish and Wildlife Program and Draft Summary of Study Results for the Eklutna Hydroelectric Project (Dec. 6, 2023); See also, USFWS, Enclosure: US Fish and Wildlife Service Comments on the Draft Fish and Wildlife Program and Draft Summary of Study Results for the Eklutna Hydroelectric Project (Dec. 6, 2023); See also, NMFS, Draft Fish and Wildlife Program preferred alternative for the Eklutna Hydroelectric Project; 1991 Fish and Wildlife Agreement (Dec. 6, 2023); See also, ADFG, Draft Fish and Wildlife Program Comment Letter (Nov. 23, 2023).

B. The Project Owners Did Not Follow the Delineation of Responsibilities in the Agreement

The Agreement carefully divides which considerations should be made by which Parties at which stage of the mitigation process. During the Study Plan stage, the Project Owners are “to examine, and quantify, if possible, the impacts to fish and wildlife from the Eklutna [...] project” and “shall consider the impacts of fish and wildlife measures on electric rate payers, municipal water utilities, recreational users and adjacent land use, as well as available means to mitigate these impacts.”¹² The Agreement then requires the Project Owners to recommend measures “for the protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat).”¹³ While it can be reasonably interpreted that the Program would include the analysis from the study plan of the impacts of fish and wildlife measures on other considerations, such as electric ratepayers, the Agreement does not state, as it does clearly in other sections, that other considerations, such as electric rate payers, power production or energy conservation, are to be considered when evaluating and recommending measures that are necessary to mitigate the Project’s impacts on fish and wildlife.¹⁴ The Agreement is clear that the Program’s only consideration is meeting the purpose of the Agreement, which is “the protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat).”¹⁵ It is then the Governor of Alaska’s responsibility, not the Project Owners’, to evaluate whether the proposed Program of fish and wildlife measures is appropriate after considering the several criteria listed in the Agreement in making his final Program determination.¹⁶ The Project Owners overreach their authority under the Agreement by claiming that they are charged not just with undertaking the study process, but also with undertaking the policy analysis to give equal consideration to the eight purposes the Governor must balance in his final decision when promulgating a Program.¹⁷ They are neither qualified nor authorized to make policy determinations and have plain conflicts of interest.

C. The Project Owners Have Not Implemented the Consultation Process to Protect Fish and Wildlife from Project Impacts “At Least As Well” as a FERC Process

The consultation process agreed to in the Agreement was intended to be “quite similar to that under [FERC] licensing of hydroelectric projects with the Governor of Alaska assigned a role similar to FERC’s in decisions on fish and wildlife measures.”¹⁸ The Agreement process was intended to work “at least as well” for fish and wildlife as a FERC relicensing process.¹⁹ Yet, the consultation process has not been implemented in a manner that matches the procedural protections afforded to fish and wildlife in a FERC relicensing process. The deficiencies in the

¹² Fish and Wildlife Agreement at 2.

¹³ *Id.* at 3.

¹⁴ *Id.* at 2, 3.

¹⁵ *Id.* at 3.

¹⁶ *Id.* at 4 (“The Governor shall give equal consideration to the purposes of efficient and economical power production, energy conservation, the protection, mitigation of damage to, and enhancement of fish and wildlife (including related spawning grounds and habitat), the protection of recreation opportunities, municipal water supplies, the preservation of other aspects of environmental quality, other beneficial public uses, and requirements of state law.”).

¹⁷ Eklutna Draft Fish and Wildlife Program at 44.

¹⁸ Divestiture Report at 18.

¹⁹ *Id.* at 20.

process include not only the impacts of project construction, but the totality of impacts of project construction, operation, and maintenance on fish and wildlife and their habitat, including the temporal loss of services and functions of a free-flowing anadromous river.²⁰

One of the primary deficiencies in the consultation process has been the Project Owners' conflation of improvements to the baseline condition with adequate protection, mitigation, and enhancement of fish and wildlife impacted by the Project. This misunderstanding of the level of protection the Project Owners are required to deliver under the Agreement, and that would similarly be required in a FERC proceeding, has contributed to an inadequate scope of study and alternatives analysis. Rather than develop and evaluate alternatives according to their comparative effectiveness in mitigating the impacts caused by the Project's dewatering of the Eklutna River and the resulting destruction of fish and wildlife habitat from the 1950s to present, the Project Owners evaluated alternatives according to their "ecological lift in terms of gains in salmon spawning and rearing habitat" compared to their cost.²¹ However, "ecological lift" is not the same as providing adequate and equitable protection, mitigation, and enhancement of fish and wildlife. In short, the Project Owners have developed a Draft Program that would be marginally better for fish and wildlife, but not one that would actually mitigate the project's impacts on fish and wildlife.²²

Another significant deficiency in the consultation process has been the Project Owners' unilateral rejection of reasonable alternatives without rigorous study or analysis.²³ This is a departure from a FERC relicensing proceeding where FERC, not the applicant, is required under the Federal Power Act ("FPA") and the National Environmental Policy Act ("NEPA") to undertake a full study of alternatives as the basis for determining that a project, as licensed, will be best adapted to a comprehensive plan of development.²⁴ Here, by contrast, the Draft Program

²⁰ See 40 C.F.R. § 1508.1(g) (definition of "effects" for purposes of environmental analysis under the National Environmental Policy Act); see also USFWS and NMFS, Final ESA Section 7 Consultation Handbook at 4-30 (Mar. 1998) ("The total effects of all past activities, including effects of the past operation of the project, current non-Federal activities, and Federal projects with completed section 7 consultations, form the environmental baseline."); see also 33 C.F.R. § 332.2 (Corps regulations requiring consideration of "temporal loss" in determining appropriate mitigation).

²¹ Eklutna Draft Fish and Wildlife Program at 31 (According to the Draft Program, "[t]he process helped to narrow down the list of comprehensive alternatives by removing those that either did not provide a significant ecological lift, or where multiple alternatives provided a similar ecological lift, those that were more costly could be removed from consideration.")

²² See Eklutna Draft Fish and Wildlife Program at 45-46.

²³ Based on our review, the Owners have exercised almost complete discretion in the scope and substance of the environmental analysis contained in the Draft Program document. This is a significant departure from a FERC proceeding where FERC is responsible for independently verifying any information it relies upon to comply with its statutory responsibilities to evaluate the environmental impacts of its licensing decisions. See, e.g., 16 U.S.C. § 797d.

²⁴ 16 U.S.C. §§ 803(a), 808(a); *Green Island Power Auth. v. FERC*, 577 F.3d 148, 168 (2d Cir. 2009) (... "FERC is statutorily obligated, pursuant to the 'best adapted' standard outlined in sections 10 and 15 of the FPA, to give full consideration to all feasible alternatives, even where it ultimately cannot license those alternatives."). FERC is subject to a parallel requirement under NEPA to develop and conduct a rigorous and detailed analysis of all reasonable alternatives. 42 U.S.C. § 4332(2)(H), 40 C.F.R. § 1502.14. Given the potentially significant impacts of continued operation of a major hydropower project, FERC complies with NEPA by preparing an environmental document that evaluates the comparative merits of several alternatives in preparation for any licensing or relicensing decision. 40 C.F.R. § 1502(b); 18 C.F.R. §§ 380.5, 380.6

does not demonstrate the Project Owners adequately considered a reasonable range of alternatives proposed for analysis by the Parties and other stakeholders.²⁵ Rather than provide enough detail about each alternative for the Governor to “evaluate their comparative merits,” the Project Owners peremptorily eliminated certain alternatives from detailed study based on their biased cost-benefit assessment.²⁶

The Project Owners’ exclusion of a dam removal alternative is an egregious error in the environmental analysis.²⁷ Dam removal is a reasonable alternative because it would provide the most protection, mitigation, and enhancement of fish and wildlife at a cost far lower than other alternatives considered.²⁸ Because the Draft Program does not consider dam removal, the Governor cannot make an informed decision as to how dam removal compares to the Project Owners’ preferred alternative.

Again, in a FERC proceeding the Project Owners would not have been allowed to unilaterally limit the analysis of alternative measures, like dam removal, to mitigate the Project’s impacts on fish and wildlife resources, over the objections of the National Marine Fisheries Service (“NMFS”) and US Fish and Wildlife Service (“USFWS”). For example, under FPA section 18, NMFS and USFWS have authority to prescribe fishways that must be included, without modification, in any license issued by FERC.²⁹ Under FPA section 10(j), a FERC license must include conditions to “adequately and equitably protect, mitigate damages to, and enhance, fish and wildlife (including related spawning grounds and habitat) affected by the development, operation, and management of the project” based on recommendations from NMFS, USFWS, and other state and fish and wildlife agencies.³⁰ NMFS would consider the fishery management plan for Pacific salmon as a comprehensive plan for considering mitigation and enhancement for salmon in this process.³¹

Another significant deficiency in the consultation process has been the Project Owners’ failure to evaluate the potential impacts of their proposed Draft Program and alternatives on the critically endangered Cook Inlet beluga whale – a national NMFS priority species – and its designated critical habitat which includes the mouth of the Eklutna River.³² Again, such evaluation would be required in any FERC relicensing under Endangered Species Act (“ESA”) section 7.³³ Given the

²⁵ See Eklutna Draft Fish and Wildlife Program at 65-75.

²⁶ *Id.*

²⁷ 40 C.F.R. § 1502.14(a).

²⁸ U.S. Army Corps of Engineers, Eklutna River Aquatic Ecosystem Restoration Technical Report at i.

²⁹ 16 U.S.C. § 811; *See American Rivers v. FERC*, 187 F.3d 1007 (9th Cir. 1999), *as amended* 201 F.3d 1186, 1210 (9th Cir. 2000) (“Where the Commission disagrees with the scope of a fishway prescription, it may withhold a license altogether or voice its concerns in the court of appeals, but at the administrative stages, ‘it is not the Commission’s role to judge the validity of [the Secretary’s] position-substantially or procedurally.’”).

³⁰ 16 U.S.C. § 803(j)(1). FERC may modify a Section 10(j) recommendation only if it finds an alternative condition will provide adequate and equitable fish and wildlife protection, mitigation, and enhancement. *Id.* at § 803(j)(2).

³¹ North Pacific Fishery Management Council, Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska. Appendix A. Anchorage, Alaska (2021).

³² *See* 76 Fed. Reg. 20,180 (Apr. 11, 2011).

³³ 16 U.S.C. 1536; 18 C.F.R. § 380.13. Under ESA section 7, all federal agencies, including FERC are required to consult with NMFS and/or USFWS to ensure that the reauthorization by the federal agency is “not likely to jeopardize the continued existence of any endangered species [...] or result in the destruction or adverse modification of habitat of such species [...]” 16 U.S.C. § 1536(a)(2); *see also*, FERC, Handbook for Hydroelectric

Agreement's express intent to provide comparable protection to a FERC proceeding, the Owners failure to fully evaluate the Project's impacts on the Cook Inlet beluga whale is inexplicable and unjustifiable.

D. The Draft Program Undervalues Traditional Ecological Knowledge

It is well-established traditional ecological knowledge that Eklutna Lake and upper tributary streams once hosted abundant salmon runs, including sockeye, Chinook, and coho salmon. The Draft Program dismisses the possibility of a substantial sockeye run to the lake and downplays the quality and quantity of salmon habitat in the upper tributaries. This conclusion ignores the traditional ecological knowledge of the Native Village of Eklutna ("NVE") that the Project Owners are well aware of and which was shared throughout the Study Plan process.³⁴

E. The Preferred Alternative is Insufficient for Protection, Mitigation and Enhancement of High Flows Blocked by the Dam

High flows are essential to mimic beneficial flooding. The maintenance flow regime in the preferred alternative is severely inadequate. The 220 cfs maximum flushing flows in the Draft Program is less than 20% of the average flushing flows of 1,402 cfs that USFWS estimated would be necessary to recreate the flows that historically supported the natural fishery and created the natural river channel and off-channel habitat.³⁵ Worse, the Draft Program imagines the peak flow for just a few hours for just three out of every ten years before returning to conditions that approximate a severe drought. NMFS concluded that the proposed flushing flows in the Draft Program "are unlikely to modify substrates and support habitat complexity in a meaningful way after nearly a century of limited impactful flow events."³⁶ The chosen channel maintenance flow hardly mitigates for the Eklutna River's deprivation of almost a century of flooding with a maximum recorded value of approximately 3,000 cfs.³⁷

F. The Draft Program Directly Contradicts Other Assessments of Historic and Potential Salmon Habitat in Eklutna Lake and Upper Tributaries

The Draft Program significantly discounts the potential of the upper Eklutna tributaries as vital salmon habitat. NVE's TWG 2021-22 Final Report combines traditional ecological knowledge with current surveys and science of the headwaters of the Eklutna River to conclude that there is expansive, preferred habitat for Chinook and coho salmon, which is currently occupied by Dolly Varden, showing its potential.³⁸ This report found that the clearwater tributaries for the West Fork have high-quality habitat and that much of the East Fork has suitable habitat in its main

Project Licensing at B-2 (Apr. 2004). In the consultation process, the action agency and consulting agencies are required to consider only the best available science. *Id.*

³⁴ See, e.g., Native Village of Eklutna, Comments of Eklutna Hydro Initial Information Package (Apr. 24, 2020); Native Village of Eklutna, NVE Comments on Proposal Final Year 2 Study Plans: Comments from a Tribal Perspective (Jun. 2022); See also, Native Village of Eklutna, TWG 21-22 Final Report at 3 (2023).

³⁵ U.S. Fish and Wildlife Service, Upper Eklutna River Survey Preliminary Fish Habitat Flow Assessment.

³⁶ National Marine Fisheries Service, Comment Letter to Draft Fish and Wildlife Program (Dec. 5, 2023).

³⁷ McMillen, Initial Information Package at 77 (2020).

³⁸ Native Village of Eklutna, TWG 21-22 Final Report.

stem and tributaries. NVE's Land and Environment Department has concluded that there are over 15 miles of salmon habitat in the upper tributaries.³⁹

The Draft Program also significantly discounts the potential of Eklutna Lake as vital salmon habitat. The Draft Program concludes that there was never a large run of sockeye to the lake, pointing to limiting factors such as the lake's turbidity, nutrient levels, and size of kokanee.⁴⁰ This current condition may be due to the denial to the lake of marine derived nutrients from salmon carcasses and impacts from the current 40-60 foot biologically devoid varial zone resulting from hydroelectric power water drawdowns around the lake, including such impacts as reduced aquatic vegetation.⁴¹ The Matanuska Susitna Borough Fish and Wildlife Commission's comments on the Draft Program state "[i]t 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 with Alaska. It also seems to ignore the effects of salmon carcasses in providing nutrient amendments for sustaining and restoring stream and lake productivity."⁴² Moreover, a primary source for the Project Owner's conclusion is a 2017 study, which they greatly misrepresent. The study concluded that its results "can[not be] construed as evidence that [salmon runs to the lake] did not [exist]."⁴³ The 2017 study, rather, found that, based on the lake's water volume and turnover rate, as many as 15,000 sockeye could have spawned in the lake annually, which is far from an insignificant number.⁴⁴ A co-author of the paper recently stated tha' "[a]nyone who cites the study to argue that Eklutna Lake had no salmon or an "insignificant" number isn't using it scientifically, they are using it politically."⁴⁵

Kleinschmidt Associates surveyed 14 areas totaling 68,512 square ft. around Eklutna Lake that are potentially suitable for sockeye spawning under favorable lake level regimes. These are now largely in the barren varial zone due to 40-60 foot lake drawdowns. However, they contain appropriate slopes, gravel sizes and seeping groundwater or potentially suitable substrate for sockeye spawning, and there may be even more than reported. A total of 331 spawned-out kokanee were observed at Eklutna Lake during the survey period, finding "[s]pawned kokanee ranged from 4.5 – 6.5 inches [...]"⁴⁶ Alaska Department of Fish and Game ("ADFG") biologists have told us these would grow to normal sockeye size if allowed to develop in the ocean and that these kokanee are likely descendants of a native ocean-run population, since there is no record that they were ever stocked. The Draft Program acknowledges that Trout Unlimited's Alternative and USFWS's Alternative B – modifying the current dam to allow upstream and downstream fish passage – both create significant gains in sockeye spawning habitat, which would come from increased lake spawning habitat.⁴⁷

³⁹ Native Village of Eklutna Land and Environment Program, Eklutna Lake and Tributaries Salmon Habitat (2024).

⁴⁰ *Id.* at 68-71.

⁴¹ *See*, Email from Rick Sinott to Dustin Lorah, NVE (Dec, 1, 2023 at 10:05AM).

⁴² Matanuska-Susitna Borough Fish and Wildlife Commission, Comment Letter on Draft Program (Feb. 9, 2024).

⁴³ Loso, Michael et al., Evaluating Evidence for Historical Anadromous Salmon Runs in Eklutna Lake, Alaska 70 Arctic at 270 (Sept. 2017);

⁴⁴ *Id.* at 259.

⁴⁵ Email from Rick Sinott to Dustin Lorah (Nov. 30, 2023 at 6:50PM).

⁴⁶ Kleinschmidt Associates, Lake Aquatic Habitat and Fish Utilization Study Year 1 Interim Report DRAFT (Feb. 2022) at 12-20.

⁴⁷ *Id.* at 42.

Overall, NVE Land and Environment Department’s assessments indicate the following stream miles would be restored by reconnecting the lake and upper tributaries to the lower river and restoring the natural flow regime: 12 miles in the river below the lake, 7 miles in the lake, and 15 miles above the lake in the upper tributaries.⁴⁸ NVE Land and Environment Department’s measurements are in stream miles, and that metric is used to assess lake habitat, so 7 miles of lake habitat undervalues the actual habitat available for restoration in the lake. These estimates also undervalue habitat off the main channel in the lower river below the lake that could be restored with higher flow releases than are proposed in the Draft Program. Full recovery would therefore restore a minimum of 34 miles of salmon habitat and likely much more taking into account the undervaluing of lake and off channel habitat. The Draft Program, on the other hand, proposes to marginally restore only 11 miles, less than 35% of the conservative estimate of possible salmon habitat in the Eklutna watershed.⁴⁹

G. The Program’s Analysis of Non-Salmonid Wildlife is Severely Inadequate

The Agreement’s protection, mitigation, and enhancement purpose is not limited to salmon but instead includes all fish and wildlife impacted by the Project. Reducing the ecological function of the tidal wetlands, lower river, lake, and upper tributaries from the Project’s impacts reduces the health of fish and wildlife throughout the watershed. However, the Draft Program is not built upon any surveys or studies of marine mammals and its consideration of terrestrial and avian wildlife and habitat is severely inadequate.

The wildlife habitat survey study area boundary was limited to the lower end of the lake, the current river channel corridor, and a section of the wetlands at the river mouth.⁵⁰ This study area boundary is insufficient and should have included the entire Eklutna watershed, including the upper tributaries, the entire lake, and the off channel stream areas in the lower river valley, given the Project harms to the whole Eklutna watershed ecosystem. Because of the limited study area, the wildlife analysis could not fully consider the protection, mitigation, and enhancement from all the alternatives, including the potential restoration of habitat from increasing flows and reconnecting the lower river to the lake and upper tributaries.

Terrestrial and avian wildlife and habitat studies were primarily conducted via aerial surveys and literature reviews, both which have issues regarding their accuracy and the amount of place-specific detail they can provide.⁵¹ A recent scientific review of the accuracy of wildlife aerial surveys stated that aerial surveys can be an efficient platform to collect observational counting data “across large spatial areas,” but which are far less well-suited for specific and small-scale geographies like the Eklutna survey area.⁵² Furthermore, the review noted common errors such as “nondetection, counting error, and species misidentification” that if not adequately addressed at all stages of the study “can provide data that obscure animal-environment relationships or

⁴⁸ Native Village of Eklutna, TWG 21-22 Final Report.

⁴⁹ *Id.*

⁵⁰ ABR, Inc., Eklutna Hydroelectric Project Wetlands and Wildlife Habitat Study Report Draft at 3 (Mar. 2023).

⁵¹ Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage (“Project Owners”), Eklutna Hydroelectric Project Draft Summary of Study Results at 46-50 (Oct. 2023).

⁵² Davis, Kayla L. et al., Errors in aerial survey count data: Identifying pitfalls and solutions, 12 Ecology and Evolution e8733 (Mar. 18, 2022).

introduce biases into inferences.”⁵³ The Project Owners provide no details or assurances that their limited surveys addressed these common errors. Furthermore, aerial and other surveys for wildlife were extremely limited. For example, only one day of raptor aerial surveys were completed, four days of migratory shorebird and waterfowl surveys were completed, and three days of moose surveys were completed, all during 2022.⁵⁴ These surveys would not account for any annual variation in wildlife abundance or timing in the Eklutna watershed, as well as seasonal access limitations, among other issues. Wildlife habitat analysis relied on historic and current aerial photography with no ground vegetation surveys completed.⁵⁵ Scientific literature on Alaska wildlife and habitat is rarely area specific and is therefore not necessarily a valid representation of species using the Eklutna watershed either for their full lifecycles or for their migration routes or travel corridors.

Overall, the Plan recognizes that increasing the Eklutna River’s flow below the dam will “directly or indirectly benefit several ecologically and/or culturally important wildlife species” such as wolves, moose, raptors, and bears.⁵⁶ Yet, because of the severe lack of adequate baseline data, it is impossible to truly analyze and understand how the different alternatives would impact and potentially benefit all wildlife and their habitat and to what degree. For example, even though listed in the “observed or expected” wildlife list, the Draft Program fails to consider imperiled species like the Little brown bat (*Myotis lucifugus*) that rely on the Eklutna watershed and for which mitigation and enhancement of their foraging habitat in the lower Eklutna River valley, which is currently harmed by the Project, could be improved by increasing flows and rebuilding off channel habitat in the lower river.⁵⁷ The Draft Program also fails to analyze why certain wildlife populations appear to be below normal levels. For example, the Summary of Study Results notes that “[w]aterfowl and shorebird numbers in the study area were moderate and low, respectively, during the field surveys” and that “[s]horebirds were noticeably absent during the spring surveys.”⁵⁸ This may be an example of a system that is in depression from nearly a century of harms from hydroelectric dams. These examples, and many others, highlight the Draft Program’s inadequacies in considering and rigorously analyzing how the different alternatives would impact all non-salmonid fish and wildlife in the Eklutna system and whether the preferred alternative provides adequate mitigation and enhancement.

Regarding marine mammals, the Draft Program fails to consider the protection, mitigation, and enhancement of Cook Inlet beluga whales, one of the nation’s most critically endangered marine mammals. The best available science shows that Cook Inlet belugas could significantly benefit from increased salmon runs in the Eklutna River. Given the mouth of the Eklutna River is within designated critical habitat in upper Cook Inlet where the majority of the Cook Inlet beluga population forages during the summer, the critically endangered whales should be a primary concern for the Program.⁵⁹ The 2011 critical habitat designation for Cook Inlet belugas identified shallow intertidal and subtidal waters of Cook Inlet in close proximity to medium to high flow anadromous fish streams along with four species of Pacific salmon (Chinook, sockeye, chum,

⁵³ *Id.*

⁵⁴ Eklutna Draft Summary of Study Results at 46-49.

⁵⁵ *Id.* at 42-43; *see*, Email from Terry Schick, ABR Inc., to Carrie Brophil, NVE (Nov. 22, 2022 at 11:27AM).

⁵⁶ Eklutna Draft Fish and Wildlife Program at 53.

⁵⁷ ABR Inc., Eklutna Hydroelectric Project Terrestrial Habitat Study Report Draft at 23 (Mar. 2023).

⁵⁸ Eklutna Draft Summary of Study Results at 47.

⁵⁹ 76 Fed. Reg. 20,180 (Apr. 11, 2011).

and coho) as essential to the beluga's conservation (also known as Primary Constituent Elements).⁶⁰ NMFS 2016 Recovery Plan for Cook Inlet belugas identifies prey availability as a threat of medium concern for their recovery.⁶¹ NMFS acknowledges the heightened importance of prey availability, specifically Pacific salmon, for conserving Cook Inlet beluga whales. NMFS' Species in the Spotlight, 2021-2025 report states that, "[s]urvival and recovery of Cook Inlet beluga whales depend on an adequate quantity, quality, and accessibility of prey resources."⁶² In a recent notice to issue an IHA proposal from the Port of Alaska, NMFS noted that, "Pacific salmon represent the highest percent frequency of occurrence of prey species in CIBW stomachs."⁶³ The notice highlighted that rich foraging areas to the north of the Port of Alaska, including the Eklutna River, are important to belugas and that the whales correlate their movements into Knik Arm around the timing of the salmon runs in those rivers.⁶⁴ A recent 2023 study by Wild et al. delineated portions of Cook Inlet, including Knik Arm and the mouth of the Eklutna River, as a Biologically Important Area (BIA) for the small and resident population of Cook Inlet beluga whales based on scoring methods outlined by Harrison et al. in 2023.⁶⁵

The best available science shows that restoring abundant salmon runs to the Eklutna River may be one of the key strategies available for Cook Inlet beluga recovery by creating more foraging opportunities for belugas in upper Cook Inlet. The results of a 2020 study by Norman et al. suggest that "reproductive success in [Cook Inlet belugas] is tied to salmon abundance" in the Deshka River, which is also located in upper Cook Inlet near Knik Arm and the Eklutna River.⁶⁶ That study showed that "if salmon runs remained at their current levels, the [Cook Inlet beluga] population would likely continue its current slow decline," yet the study found that "if Chinook salmon increased 20% or more, the current decline would likely be reversed."⁶⁷ Furthermore, the study simulations found that "doubling the salmon abundance would be sufficient to allow recovery of the population regardless of impacts from other threats."⁶⁸ The study noted that while Chinook are the most nutritionally important salmon species for Cook Inlet belugas, belugas still rely on other salmon species as important prey.⁶⁹ Moreover, a recent 2023 study by McHuron et al. found that if there is enough prey abundance for Cook Inlet belugas, the whales can withstand other intermittent stressors, concluding that increasing prey availability increases the beluga's resiliency to threats.⁷⁰ Another recent 2023 study by Warlick et al. stated that "aerial

⁶⁰ 76 Fed. Reg. 20,203, 20,214 (Apr. 11, 2011).

⁶¹ National Marine Fisheries Service, Recovery Plan for the Cook Inlet Beluga Whale at III-13 (2016).

⁶² NOAA Fisheries, Species in the Spotlight – Cook Inlet Beluga Whale, Priority Actions 2021-2025 at 14 (Apr. 21, 2021).

⁶³ 88 Fed. Reg. 76588 (Nov. 6, 2023).

⁶⁴ *Id.*

⁶⁵ Wild, Lauren A. et al., Biologically Important Areas II for cetaceans within U.S. and adjacent waters – Gulf of Alaska Region, 10 Front. Mar. Sci. 1134085 (May 5, 2023); Harrison, Jolie, Biologically Important Areas II for cetaceans within U.S. and adjacent waters – Updates and the application of a new scoring system, 10 Front. Mar. Sci. 1081893 (Mar. 14, 2023).

⁶⁶ Norman, S. et al., Relationship between per capita births of Cook Inlet belugas and summer salmon runs: age-structured population modeling, 11 Ecosphere 1 (2020).

⁶⁷ *Id.* at 1, 9.

⁶⁸ *Id.* at 10 (emphasis added).

⁶⁹ *Id.*

⁷⁰ McHuron, Elizabeth A. et al., Modeling the impacts of a changing and disturbed environment on an endangered beluga whale population, 483 Ecological Modeling 110417 (Sept. 2023).

survey data suggest that the [Cook Inlet beluga] population continues to decline[, and the] leading hypotheses include reduced prey availability [...].”⁷¹

The proposed nominal flow releases from the AWWU Portal will only minimally enhance Chinook and coho salmon and their habitat in the lower Eklutna River. The AWWU Portal provides no solution for the complete blockage of salmon reaching the extensive lake spawning habitat required by sockeye salmon and miles of upper tributaries spawning habitat above the lake that is highly amenable to Chinook and coho salmon, both of which are primary forage species for Cook Inlet belugas.⁷² Without connection to Eklutna Lake, protecting, mitigating, and enhancing those key spawning grounds and habitat is impossible. In turn, the mitigation and enhancement for Cook Inlet beluga whales are likely to be minimal as well. Furthermore, no analysis was completed for how the other alternatives considered would benefit Cook Inlet belugas.

The Draft Program’s severely inadequate analysis of non-salmonid fish and wildlife fails to meet the purposes of the Agreement and the standard of a similar federal process, and severely inhibits the Governor’s ability to make an informed decision.

H. The Draft Program Does Not Provide Specific Information Regarding Additional Requirements for the Draft Program or Any Alternatives

The Draft Program states that there may be additional requirements to implementing the Program, including the potential need to secure permits, land rights, easements and Amendment of ADL 44944.⁷³ The Draft Program also states required tax increases approved by the Anchorage Assembly and CEA and MEA rate increases that must be approved by the Regulatory Commission of Alaska. However, it does not describe any strategies the Project Owners have developed for securing necessary permits, land rights, or tax and rate increase approvals for the Draft Program or any alternatives. Instead, the Draft Program document flatly states, “[s]hould any of these requirements fail to be achieved, the Project Owners will not be able to execute on the Fish and Wildlife Program.”⁷⁴

The one binding approval the Project Owners to have appeared to have secured is with AWWU for the use of the AWWU pipeline.⁷⁵ This binding agreement should be made public under section 3 of the 1991 Agreement, especially because it appears to have been signed before the release of the Draft Program during the Study Plan period. Yet, the Project Owners have declined to provide this to the public after numerous requests from NVE, the Anchorage Assembly, and others. Without this binding agreement, the public was not able to fully provide

⁷¹ Warlick, A.J. et al., Identifying demographic and environmental drivers of population dynamics and viability in an endangered top predator using an integrated model, *Anim. Conserv.* (Oct. 6, 2023).

⁷² See, e.g., Native Village of Eklutna, Eklutna Lake and Tributaries Salmon Habitat (2024); See also, McMillian Jacobs Associates, Eklutna Lake Aquatic Habitat and Fish Utilization, Year 2 Study Report Final (2023); See also, Native Village of Eklutna, TWG 2021-2022 Final Report.

⁷³ See Eklutna Draft Fish and Wildlife Program at 81.

⁷⁴ *Id.*

⁷⁵ See, Project Owners, Letter to Anchorage Assembly Re: AR No. 2024-40: Corrections and Responses at 6 (Feb. 12, 2024).

testimony and comment on the Draft Program. We believe the withholding of this document is unlawful on the 1991 Agreement. We request the Project Owners release this agreement with AWWU immediately.

Further, there is no basis for the Project Owners' suggestion that their inability to satisfy any "additional requirements" for implementation of the Program is a legitimate basis for their non-performance under the Agreement. Instead, the likelihood of the Project Owners being able to secure permits and property rights necessary for successful implementation of the Draft Program and reasonable alternatives is relevant to the alternatives analysis.

Based on our review, there are several issues related to the Project Owners' ability to secure permits for the Draft Program. The 15% design drawings included in the Draft Program show that the construction of the proposed AWWU Portal would include construction of above ground utility infrastructure as well as eight new bridges and road improvements for the AWWU water supply access road within Chugach State Park. Such construction within the State Park would be a "conversion" of Land and Water Conservation Fund property requiring approval by the Department of Interior ("DOI").⁷⁶ Further, any DOI decision approving conversion would be a federal action requiring compliance with NEPA and ESA section 7.

Additional review of the 15% design drawings shows that the Draft Program includes the addition of riprap fill material directly into the Eklutna River channel at the location of the AWWU Portal discharge, which would be subject to compliance with Clean Water Act section 404 and may require an individual permit from U.S. Army Corps of Engineers. Such permitting decisions would also be a federal action subject to compliance with NEPA and ESA section 7.⁷⁷

The Project Owners need to address these and any other permitting requirements and pathways for the proposed AWWU Portal as compared to dam removal and any other reasonable alternatives for the Parties, the public, and the Governor to make informed comments and decisions, respectively.

III. Interpretation of the Right to Judicial Review Limitation is Inappropriate and Unsupported

The Draft Program states that "Pursuant to the 1991 Agreement and APA Asset Sale Act, the Governor's decision regarding the provisions of the Final Fish and Wildlife Program is reviewable and enforceable by the Parties in the U.S. District Court for the District of Alaska."⁷⁸ We dispute this as a statement of the Project Owners' opinion, which has been misleadingly presented as a formal conclusion without any legal basis. Neither the APA Asset Sale Act nor the

⁷⁶ See Eklutna Draft Fish and Wildlife Program at Appendix E; *see also*, 36 C.F.R. § 59.3; *see also*, Alaska Department of Natural Resources, Chugach State Park Management Plan at 31-32 (Feb. 2016) ("All of Chugach State Park is considered an LWCF protected area and is subject to the program provisions. Any property within an LWCF protected area may not be wholly or partly converted to anything other than public outdoor recreation uses without the prior approval of the Secretary of the U.S. Department of the Interior." "Actions that may represent a conversion of use include installation of [...] above ground utilities, development of roads for primary purposes other than recreation [...]").

⁷⁷ See Eklutna Draft Fish and Wildlife Program at Appendix E; *see also*, 33 U.S.C. § 1344.

⁷⁸ Eklutna Draft Fish and Wildlife Program at 17 (emphasis added).

Agreement limit judicial review to the Parties, and any such limitation would appear to violate principles of due process given, separate and apart from the enforceability of the Agreement as a contract between the Parties, the Governor’s final decision on the Fish and Wildlife Program would affect rights and interests far beyond those of the individual Parties, including members of the Center.⁷⁹

IV. Concerns Regarding the Project Owners Preferred Alternative Must Be Fully Analyzed

The Project Owners’ “AWWU Portal Valve” preferred alternative is rife with issues that qualified, reputable, and independent experts have highlighted.⁸⁰ The Project Owners must fully analyze and understand these issues, as well as provide a plan for addressing them, before making any further decisions.

V. Adequate Dam Removal Analysis

Adequate analysis a dam removal alternative must be based on the following conditions and assumptions and must correct the following inaccuracies.

A. Dam Removal Only Once Alternative Sources of Renewable Energy Are Available

The dam removal analysis should presume that dam removal will only occur once alternative sources of renewable energy are available, such as the 65MW Dixon Diversion expansion of the Bradley Lake hydroelectric project, large-scale wind and solar energy projects, required enhanced grid efficiencies on the Railbelt through coordinated dispatch,⁸¹ and increased consumer and commercial energy efficiency. It should be noted that there are no proposals or requests for analysis of dam removal that takes place before these conditions are met, and we are not requesting analysis of dam removal that would require Eklutna hydroelectric power to be replaced by methane gas.

B. AWWU Water Withdrawals and Downstream River Flow Concerns with the Eklutna Lake Dam Removed

The Project Owners have recently claimed that without the Eklutna Lake dam, AWWU water withdrawals in the winter months could cause flows out of the lake to cease and the river to run dry.⁸² This analysis, and the modeling upon which it is based on, has never been presented to stakeholders, fish and wildlife agencies, or independent experts for verification, review, and feedback. Based on our initial review, we believe this analysis is highly misleading and based on incorrect assumptions. Moreover, we believe that even if the concern has some limited validity, there are highly feasible engineering solutions available to resolve the issue. Dam removal

⁷⁹ See Pub. L 104-58, title I § 104(c)(1); Fish and Wildlife Agreement at 5.

⁸⁰ See, Spiegel, Donald, Executive Summary: Eklutna River Restoration Project Issues Paper (Feb. 14, 2024); See also, Spiegel, Donald, Project Issues Paper: Eklutna River Restoration Project (Feb. 24, 2024); See also, Anchorage Assembly, Letter to Eklutna Hydroelectric Program Development Team (Feb. 16, 2024).

⁸¹ Alaska SB 123 (2020); Regulatory Commission of Alaska, Order R-20-001 (May 18, 2020).

⁸² McMillen, Eklutna Fish and Wildlife Program Chugach BOD Meeting Slides (Feb. 12, 2024).

analysis must be based on accurate AWWU withdrawal figures and vetted flow models, and include engineering solutions to downstream flow concerns.

The AWWU water withdrawal rates the Project Owners are basing their assumptions on are misrepresented. The AWWU system experiences maximum usage during the summer months of June and July (occasionally August), during weeks of hot summer weather. Water usage in winter months is significantly lower than in summer. This is very typical for systems in places like Anchorage that are not winter resort or heavily visited winter season areas (rather Anchorage is experiences a very significant influx of people during the summer months). Based on the historical record, AWWU production from Eklutna is as follows:

- Average annual production (average day for the year) is about 21 mgd (32 cfs)
- Minimum month production (November – January) is about 19 mgd (29 cfs)
- Maximum month production (June – July) is about 27 mgd (42 cfs)
- Maximum day production is about 32 to 33 mgd (50 to 51 cfs)

These production rates align with average rates for municipal and industrial water usage in municipalities nationwide. These rates show the significant increase in withdrawals and production in the summer months compared to the winter.

In a recent presentation by the Project Owners’ consultant to the Chugach Electric Association Board of Directors, the consultant presented AWWU withdrawals as stable over the course of the year, stating that “With AWWU pulling their maximum water right of 41 MGC (63.4 cfs). The [sic] river would run dry most winters.”⁸³ Based on historical averages, AWWU does not come close to withdrawing 63.4 cfs, even during maximum day production during hot summer weeks. And the rate of production is certainly not flat over the course of the year. These kinds of misleading presentations of data, along with no references as to the source of their data nor any presentation on the modeling upon which their flow calculations are based upon, call into question the reliability of their data and analysis.

Furthermore, there are highly feasible engineering solutions available to ensure that the Eklutna River can remain watered and AWWU can maintain withdrawals during winter months in dry years. For example, a potential solution would be to install a manhole (cylinder) pump station near the location of the existing dam that would intake water from the west end of the lake near the current dam and release it near the base of the current dam spillway structure. This pump station would allow continued flow in the Eklutna River during winter months in dry years while allowing continuous AWWU withdrawals of their historic averages (and up to their maximum water right). The exact locations of the pump station, suction pipe, and location of discharge pipe should be based on study of the profile and geology of the bottom of Eklutna Lake. AWWU has numerous cylinder pump stations of similar configurations in operation today, and cylinder pump stations are very common in sewer and drainage projects around the country and the world.

⁸³ McMillen, Eklutna Fish and Wildlife Program Chugach Board of Directions Meeting Slides (2024).

C. Costs of Dam Removal

The Project Owners have compared the potential costs of removing the Eklutna Lake dam to such projects as the Elwha and Glines Canyon dam removal project (more than \$350 million) and Lower Klamath River dams removal project (estimated at \$397 million). Those dam removal projects are categorically different and larger than removing the Eklutna Lake dam. For example, the Lower Klamath River dams removal project is the largest dam removal project in the world, including removing four dams on one of California's largest river systems and restoring thousands of acres of land previously inundated by four completely unnatural reservoirs. The lower Eklutna dam was removed for \$7.5 million which was a far more difficult and complex, and thus expensive, project than what it would cost to remove the Eklutna Lake dam. Costs must be accurately analyzed for dam removal of the Eklutna Lake dam.

D. Eklutna Lake Level and Resultant Spawning Habitat

The analysis should assume that once the Eklutna Lake dam has been removed, Eklutna Lake must be kept sufficiently full and spilling into the Eklutna River, except for short time periods in rare winter months during dry years (and we suggest an engineering solution to address those rare periods). This means that the Eklutna Lake level must not fall below 851 feet such that all available lakeshore spawning habitat always remains inundated. In other words, the analysis must properly account for all available lakeshore sockeye spawning habitat under "full lake" conditions. Moreover, the analysis must properly account for the full mileage of available spawning habitat in the tributary streams above the lake.

E. Peak Flow Assessments

The Project Owners have stated in numerous presentations and letters that removal of the dam would result in flows below the lake "peaking at 2,500 cfs every few years to 4,000 cfs every ten years." In their 2019 Eklutna River Flow Assessment, USFWS's data shows that flows of 2,500 cfs and 4,000 cfs would be far less regular than every "few" to ten years, respectively. Rather, at the extremes, it shows the likelihood of 2,500 cfs flows are between ~5-50 years, and the 4,000cfs likelihood interval is between ~20-500+ years, with an annual probability of 0.2%.⁸⁴

We contest the inflated peak flow numbers the Project Owners are using and the models upon which these flow estimates are being generated. These numbers and models are being used for subsequent dam removal analysis by the Project Owners' consultant and AWWU, and these analyses must therefore be called into question. We suggest consulting with the fish and wildlife agency experts, as the 1991 Agreement requires, and resolving any differences in models and flow estimates before any further analysis is completed. If differences remain, the fish and wildlife agency experts flow estimates for analyzing lower river flows after removal of the dam should be used.

F. Downstream Bridge Safety

⁸⁴ USFWS, Preliminary Fish Habitat Flow Assessment at Appendix B (July 14, 2019).

The Project Owners' have stated concerns about downstream bridge safety from peak flow events once the dam was removed. There are three main bridges below the Eklutna Lake dam: the Old Glenn Highway Bridge, the New Glenn Highway Bridges, and the Railroad Bridge.

The Old Glenn Highway Bridge was replaced in 2015. The Project Owners have stated without citation that this bridge's maximum hydraulic capacity is less than 1,800 cfs.⁸⁵ This is false and highly misleading. We assume that the Project Owners are basing this estimate on the 2015 Eklutna River Bridge Hydrologic and Hydraulic Report.⁸⁶ This report explicitly does not state that the bridge's maximum hydraulic capacity is less than 1,800 cfs. Rather, the analysis for the hydraulic capacity of the bridge only considered flows up to 1,800 cfs because the report considered 1,800 cfs the 500-year flood level with the dam in place. Using this report to state that the hydraulic capacity of the Old Glenn Highway Bridge is less than 1,800 is patently false. The correct conclusion of this report is that the new Old Glenn Highway Bridge has a hydraulic capacity of at least 1,800 cfs. The analysis can be implied to conclude that 4,000 cfs peak flows would be well within the new bridge's hydraulic capacity and would likely have no impact on the bridge, especially given the predicted infrequency of these peak flows. A supplemental hydraulic report would be required to accurately state the maximum hydraulic capacity of the bridge with the Eklutna Lake dam removed.

The Project Owners' Draft Program states that the New Glenn Highway Bridges, which were constructed in 1975, have a hydraulic capacity of less than 4,700 cfs.⁸⁷ There is again no citation for this statistic, and we wonder what analysis this figure relies upon. Nonetheless, given the Project Owners' estimated peak flows of 4,000 cfs, the New Glenn Highway Bridges have ~17% of additional hydraulic capacity and should not be negatively impacted by maximum peak flows. The Draft Program states that the Railroad Bridge has a hydraulic capacity of less than 8,000 cfs (also without citation). This is more than double the estimated peak flows. Without additional analysis that shows otherwise, we see no reason why the current downstream bridges cannot withstand peak flows from an undammed Eklutna River.

Additionally, the Project Owners have stated concerns about sediment transport during peak flow events from remaining sediment that was once trapped behind the lower Eklutna dam that was removed in 2018. Our proposed dam removal alternative advocates for the Eklutna Lake dam being removed within the next decade. There are abundant examples of dam removal projects that have safely addressed sediment transport and downstream infrastructure at a scale far greater than in the Eklutna, and the Project Owners' dam removal analysis should explore these examples and provide for a managed sediment reduction program before dam removal through planned flushing flows and other mechanisms.

G. AWWU Pipeline Scouring

The lower Eklutna River is certainly not the only river under which a pipeline flows, and while the Project Owners have cited scouring concerns, we request to see full analysis of these

⁸⁵ Project Owners, Eklutna Draft Fish and Wildlife Program at 8.

⁸⁶ R&M Consultants, Eklutna River Bridge Hydrologic and Hydraulic Report (Mar. 2015).

⁸⁷ Draft Program at 8.

purported issues and how they could be addressed. This analysis must be based on a river routing model at credible design flows to determine scour velocities and depths of the AWWU pipeline. The results of this model may show that there are no additional protection measures required to secure the AWWU pipeline. If the model shows the need for additional protections, the analysis must explore a wide range of options for addressing such scouring concerns. These options could include additional armoring, digging pipeline sections deeper, a combination of techniques, or any other treatments recommended by a pipeline expert. We feel confident there are highly feasible solutions to address these concerns.

H. Dam Removal Benefits to All Fish and Wildlife

The dam removal analysis must consider the benefits to salmon of not just reconnecting the lower river to the lake and upper tributaries, but also returning a more natural flow regime to the lower river, including all side channels and off-channel habitat. Moreover, as we discussed at length in our December 2023 comments on the Draft Program, the 1991 Agreement protection, mitigation, and enhancement requirements extend to all non-salmonid fish and wildlife in the Eklutna watershed. As such, the dam removal analysis must meaningfully analyze the impacts, especially the positive benefits, to all fish and wildlife. This includes the benefits of a restored natural flow regime along with sediment transport and restored off-channel habitat on shorebirds that use the Eklutna estuary and other birds in the watershed as well as terrestrial and marine mammals. In particular, the dam removal analysis must fully analyze the benefits of dam removal and potential resultant salmon abundance increases for Cook Inlet beluga whales, a critically endangered species listed under the federal Endangered Species Act.

VI. The Project Owners Should Agree to a Multi-Year Extension

We fully support and encourage the Project Owners and Parties to the 1991 Agreement to undertake a multi-year extension for further study, analysis, and resolution of differences before proposing a Final Fish and Wildlife Program.⁸⁸ The 1991 Agreement, as essentially a standard contract, can be revised, including its scheduled dates, with the agreement of all signatories.

Sincerely,

/s/ Cooper Freeman

Cooper Freeman

Alaska Representative & Senior Advocate

Center for Biological Diversity

cfreeman@biologicaldiversity.org

(907) 531-0703

⁸⁸ Anchorage Assembly, AR No. 2024-40, As Amended (Feb. 2, 2024).

THE
CONSERVATION FUND

Brad Meiklejohn
Senior Alaska Representative
2727 Hiland Road
Eagle River, Alaska 99577
(907) 694 - 9060
bmeiklejohn@conservationfund.org

February 18, 2024

Sam Owen
McMillen Jacobs

Todd Glass
Chugach Electric Association

RE: Addendum to TCF Comments on the Eklutna Draft Fish and Wildlife Program

Dear Ms. Owen and Mr. Glass,

Please accept the following as an addendum to the previously submitted formal comments and statement of position of The Conservation Fund on the Draft Fish and Wildlife Program. This addendum responds to remarks made by both of you as reported by Alaska Public Media under the header “Eklutna Hydro Owners Say They Won’t Extend Wildlife Restoration Process.” It’s worth noting that even here the reporter uses the word “restoration.”

We agree with Mr. Glass that the Eklutna Owners should not be obliged to restore the entire Eklutna River. Your obligations to restore the Eklutna River only obtain to that section of the Eklutna River degraded by the Eklutna Hydroproject; that is, the 8 miles between the former Lower Eklutna River Dam and Eklutna Lake that were and remain largely dewatered because of your operations. The only things stopping sockeye salmon from once again returning to Eklutna Lake are the Eklutna Lake “dam” and your dewatering of the river.

Mr. Glass, who appears to be speaking on behalf of the Eklutna Owners, asserts that “We never owned the lower dam. The dams were not part of what we bought in ’97.” A history refresher is in order for Mr. Glass. Anchorage Light & Power, the original developer of the Lower Eklutna Dam hydroproject, sold the project to the City of Anchorage in 1943; the City (which is now one of the Eklutna Owners) operated the Lower Eklutna River hydroproject until it sold “all its interest in and to said water rights, said generating plant, and associated facilities and properties” to the U.S. Bureau of Reclamation in 1953 for \$1.8 million to allow for the development of the Eklutna Hydroproject at

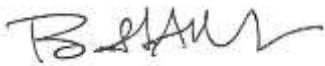
National Office
1655 North Fort Myer Drive
Suite 1300
Arlington, Virginia 22209
(703) 525-6300
www.conservationfund.org

Eklutna Lake. In 1989 the federal government agreed to sell to Eklutna Owners “the Eklutna Hydroelectric Project authorized, constructed, and operated pursuant to the Eklutna Project Act of July 31, 1950, including any and all property and facilities acquired or used in connection with Eklutna.” According to the Initial Information Package “the asset lists developed for the sale pursuant to the 1989 Eklutna Purchase Agreement did not include the lower diversion dam.” Prior to the demolition of the Lower Eklutna River Dam in 2016, Eklutna Inc. filed a quiet title action because of the uncertainty surrounding the ownership of the Lower Dam.

One of the Eklutna Owners (the City of Anchorage) clearly owned and operated the Lower Eklutna Dam, contrary to Mr. Glass’s statement that “We never owned the lower dam.” The City sold the Lower Dam and all its rights and infrastructure to allow for the construction of the Eklutna Hydroproject. “The signing of the above contract removed the last remaining legal hurdle to construction of the Eklutna Project.” To claim that these two hydroprojects are not intimately and legally related is false.

The APRN reporting contained graphics presented by Ms. Owen that contend that the Eklutna River could run dry in the winter months of some especially dry years. Presumably the analysis behind these graphics factors in actual winter consumption, not average annual consumption? AWWU winter consumption (Nov – Feb) is typically 85-90% of average annual consumption (19 mgd vs 21 mgd [29 cfs vs 32 cfs]). This rare event can be managed through the installation of a pump and piping system as described in the attached documents. Such a system would be a natural compliment to the removal of the Eklutna Lake Dam and deserves to be incorporated into additional analysis.

Sincerely,



Brad Meiklejohn
Senior Alaska Representative

Eklutna River Restoration Project Cylinder (Manhole) Pump Station in Eklutna Lake Proper

- 1 **Basis of Need** – there may be a need to improve (or add) to the AWWU Portal Project for various reasons as follows:
 - 2 The AWWU Portal alternative is a “single straw” into Eklutna Lake. The operation and thus success of the alternative relies on 35-year old infrastructure to be 100% available. The suggested mitigation for the “single straw” option is use of an existing gated opening at the base of the Eklutna Dam spillway structure that would allow Eklutna Lake water (or some ponded water when the Lake level is below the gated opening) to flow into the Eklutna River. Project documentation has stated that the pond may be capable of supplying up to 12 hours of water. The gate will be controlled to open when the Eklutna Water Project infrastructure is unavailable. This is a flawed concept because the bottom elevation of the opening is Elevation 852. Eklutna lake is below Elevation 852 six months out of the year and thus the gate cannot provide reliable water for a long-term (greater than 12 hour) outage.
 - 3 The last mile of the Eklutna River between the bottom of Eklutna Dam and the AWWU Portal facility is not part of the restoration zone.
 - 4 The AWWU Portal release may impact the ability of AWWU to operate at the original design capacity of the Eklutna Water Project.
-
1. **Description of “Second Straw”** – Install one manhole (cylinder) pump station adjacent to Eklutna Lake near the Eklutna Dam and discharge to the pond that routes water to the gate at the base of the spillway structure. This Project alternative can alleviate all three concerns above.

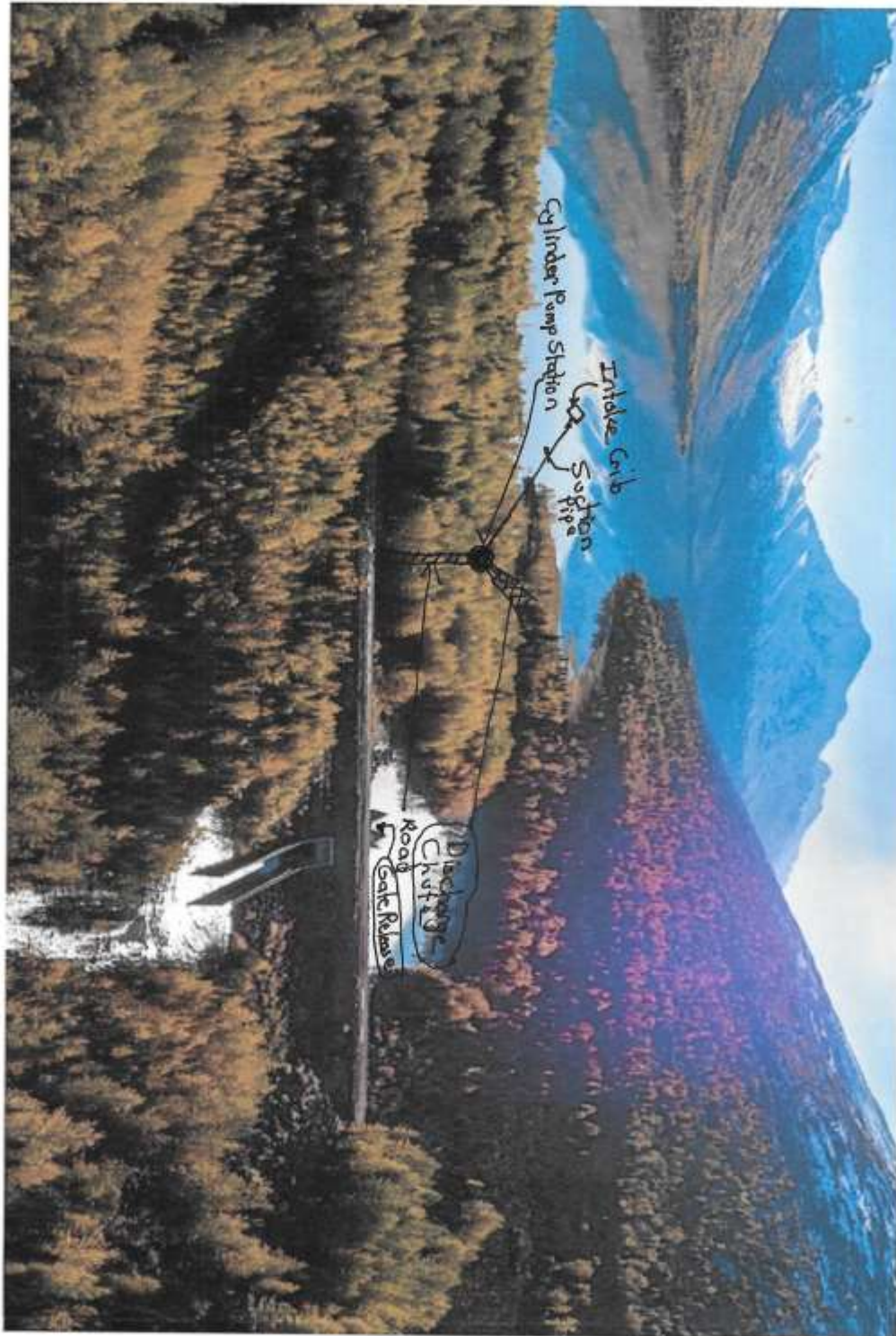
1. **Details of the “Second Straw”:** Facilities necessary to construct the Second Straw:

- Construct one 16- foot minimum diameter concrete shaft adjacent to or in Eklutna Lake close to the existing pond. Bottom elevation should be at about 800. Top elevation should be at approximate Elevation 880 to match existing grade adjacent to the structure. The shaft top should be above Lake high water level for access and maintenance.
- Install three submersible non-clog centrifugal pumps, or three dry pit centrifugal pumps (depending on whether the shaft is designed for submersible or dry pit pump configuration). Pumps should be 8.6 mgd at about 45 feet of head (about 100 horsepower each) for 40 cfs total.
- Construct a suction pipe from the pump station into Eklutna Lake to obtain a bottom elevation of 800 to 805. Size would be 48-inch. Distance would be such to find the bottom elevation of 800.
- Install a stainless steel intake “crib” or box on the end of the suction pipeline.
- Install discharge pipeline from the pump station over the moraine to a close edge of the pond. Routing could be shallow bury and the pipeline must be anchored to prevent buoyancy. Pipeline number may be one at 36-inch diameter or two at 24-inch diameter. Civil works could reduce the piping length so that the water flows mostly overland to the pond.
- Provide a new electrical service from MEA to a new Electrical Room set at the top of the Pump Station. The pumps will be 480 volts.
- Construct one Electrical Room to house the electrical service equipment, three motor starters and control equipment.
- Operate the pump station in tandem with the AWWU Portal facility. Operation can take three forms: (1) the AWWU Portal Facility “straw” operates as primary; (2) the Eklutna Lake Pump Station “straw” operates as primary; or (3) both “straws” operate simultaneously. The two facilities will be communicating via SCADA so switchover for planned or emergency events can happen quickly and, if desired, automatically. No generator backup is thus required at the pump station.

1 **Pump Station Information:** Some information about the pump station in general and this adder alternative in particular:

2 Cylinder (manhole) pumps stations are very common in sewer and drainage projects around the country and around the world.

- AWWU has numerous cylinder (manhole) pump stations operating today of similar configurations and at depths of as much as 70 feet. Two example stations are Pump Station 2 in the Bootleggers Cove area of Anchorage (about 70 feet deep) and the Potter Creek Pump Station which is below water level all the time and is about 40 feet deep.
 - Location of the pump station, location of the suction pipe and location of the discharge pipe within Eklutna Lake will require some study of the profile of the bottom of Eklutna Lake and also the geology of the bottom of Eklutna Lake. Exact placement can only occur after such study.
1. **Future Benefits of the “Second Straw”:** This project adder blends well with the possibility of the future removal of the dam. The pump station can continue to operate as the dam is removed so the entire reach of the Eklutna River is maintained in a flowing condition. The pump station would also allow continued flow in the Eklutna River during periods in dry years when water is below the level of the moraine and is thus naturally unable to feed the Eklutna River.



February 19, 2024

Eklutna River Hydroelectric Project Owners:

Municipality of Anchorage (MOA)

Chugach Electric Association (CEA)

Matanuska Electric Association (MEA)

VIA EMAIL: info@eklutnahydro.com

Re: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

Dear MOA, CEA, and MEA:

The Alaska Wildlife Alliance (AWA) provides the following comments on the Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage ("Project Owners")'s Eklutna Hydroelectric Project Draft Fish and Wildlife Program ("Draft Program").¹ The Alaska Wildlife Alliance is a non-profit organization based in Anchorage, founded in 1978 by Alaskans, and speaks for more than 1,500 supporters of Alaska's wildlife. We advocate for healthy ecosystems which are ethically and scientifically managed to protect our wildlife for present and future generations.

Since the Eklutna Hydroelectric Project ("Project") became operational in 1955, it has caused the Eklutna River to run dry. The hydrological record is clear on this point:

"Currently, no water spills over the Eklutna Lake Dam down the river except during floods. A 4.5-mile bypass tunnel diverts water from the lake to the power plant. Of the water diverted, 90% is diverted to the Knik River for hydropower, while 10% is diverted for Anchorage drinking and wastewater, effectively blocking the remaining 14 miles of Eklutna River from its water source."²

The Project's adverse effects on fish and wildlife resources in the Eklutna River were not evaluated for almost 70 years after project construction due, in part, to the existence of the lower diversion dam, which prevented salmon from ascending to Eklutna Lake and the upper reaches of the river. However, since the lower diversion dam was removed in 2018, the Project's continued diversion of all controllable flow at Eklutna Lake to the Project's powerhouse on Knik Arm and the complete disconnection of the river to the lake and upper tributaries are, and will continue to be under the Project Owners' Program, the primary causes for ongoing degradation of fish and wildlife habitat in the Eklutna River system.

¹ Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage ("Project Owners"), Eklutna Hydroelectric Project Draft Fish and Wildlife Program (Oct. 27, 2023) https://eklutnahydro.com/wp-content/uploads/2023/10/2023-10-27-Eklutna-Draft-Fish-and-Wildlife-Program_withAppendices.pdf.

² Native Village of Eklutna, "Eklutna River: Idlughetnu" (accessed Nov. 17, 2023) <https://eklutna-nsn.gov/departments/land-and-environment/eklutna-river/>; see also, Kleinschmidt Associates, Draft Instream Flow Technical Memo at 2 (Sept. 28, 2022) https://eklutnahydro.com/wp-content/uploads/2022/12/2022-9-27-EklutnaInstream-Flow-Tech-Memo_DRAFT.pdf ("In 1955, the federal government completed construction of a new hydropower project and in 1964 a new storage dam which effectively eliminated any flow releases from Eklutna Lake to the Eklutna River.").

Rather than fully evaluate alternatives that would avoid, minimize, or mitigate the project's adverse effects, as would generally be required for the relicensing of any other similarly-sized non-federal hydropower project, the Project Owners have put forward a Draft Program that would maintain those adverse effects by continuing to dewater a portion of the lower Eklutna River and deny salmon access to the majority of the system's salmon habitat for the next 35 years. The Draft Program shows that the Project Owners did not fully evaluate alternatives that would mitigate and enhance, let alone avoid or minimize the Project's ongoing impacts to sockeye, Chinook, and coho salmon habitat even though the loss of the sockeye salmon run was one of the express reasons for the 1991 Eklutna Fish and Wildlife Agreement.

Purpose of the 1991 Eklutna Fish and Wildlife Agreement

The purpose of the 1991 Eklutna Fish and Wildlife Agreement ("Agreement") and the resultant Fish and Wildlife Program is to develop and implement measures to "protect, mitigate damages to, and enhance fish and wildlife (including related spawning grounds and habitat)" from the harms of the Project.³ Salmon spawning grounds and habitat harmed by the project include the lower Eklutna River below the dam, Eklutna Lake, and the upper tributaries to Eklutna Lake. The Divestiture Summary Report for the Sale of Eklutna and Snettisham Hydroelectric Projects ("Divestiture Report"), to which the Agreement is an appendix, notes that mitigating harms to sockeye salmon and their spawning habitat was particularly important in creating the Agreement. The Divestiture Report explained that "[d]uring reviews of the legislative proposal, loss of a sockeye salmon run that once spawned in Eklutna Lake was identified[...]" 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."⁴ The Divestiture Report notes that the Agreement's fish and wildlife measures were intended to "work at least as well as Federal regulation for the intended purpose of mitigation and enhancement of affected fish and wildlife resources," and were to be "quite similar to that under the [Federal Energy Regulatory Commission ("FERC")] licensing" process for hydroelectric projects.⁵

In comparison, the "AWWU Portal" plan proposed in the Draft Program by the Project Owners leaves Eklutna Lake and its upper tributaries completely disconnected from the lower Eklutna River, maintaining over a mile of dry streambed.⁶ Furthermore, the flows the Project Owners propose to release from the AWWU Portal are the minimum flows considered by any of the signatory parties to the Agreement ("Parties") during the Agreement study process, with inadequate higher flushing flow events in only three out of every ten years.⁷

³ Fish and Wildlife Agreement Snettisham and Eklutna Projects at 1 (Aug. 7, 1991)

<https://eklutnahydro.com/wpcontent/uploads/2019/05/1991-Fish-and-Wildlife-Agreement.pdf>; See also Eklutna Draft Fish and Wildlife Program at 45; See also Alaska Power Administration Asset Sale and Termination, Pub. L. 104-58, title I § 104(a)(2) (Nov. 28 1995) <https://www.govinfo.gov/content/pkg/STATUTE-109/pdf/STATUTE-109-Pg557.pdf>.

⁴ Divestiture Summary Report, Sale of Eklutna and Snettisham Hydroelectric Projects at 19 (Apr. 1992) <https://eklutnahydro.com/wp-content/uploads/2020/03/APA-1992-Divestiture-Summary-Report.pdf>.

⁵ Id. at 20, 18.

⁶ Eklutna Draft Fish and Wildlife Program at 46-56.

⁷ Id. at 39, 40; see, e.g., Trout Unlimited, Eklutna River Workshop: Summary of Outcomes, Recommendations, and Future Needs at 4-6; see also, e.g., U.S. Fish and Wildlife Service, Upper Eklutna River Survey Preliminary Fish

The Preferred Alternative (“AWWU Portal”) is Insufficient for Salmon and Does Not Provide for a Connected Ecosystem

The AWWU Portal puts the least amount of water in the river of all the alternatives for regular flows and high-flow events.⁸ The justification for choosing the lowest flow alternative primarily comes from economic considerations rather than what is best for fish and wildlife. The Agreement makes clear that the consideration of non-fish and wildlife factors should be made by the Governor, not by the Project Owners in the Draft Program. The preferred alternative continues to create a dead-end river, with over a mile of dry streambed below the dam. Creating a dead-end river hardly mitigates the damages caused to fish and wildlife from the Project because it prevents connectivity between Knik Arm, the lower Eklutna River, the lake, and the upper tributaries. The preferred alternative cannot mitigate damages to sockeye in any way because it will continue to prevent nearly all anadromous sockeye from spawning in the Eklutna River system. Because the destruction of the sockeye run was the “specific concern” leading to the Agreement, a Program that continues to prevent almost all sockeye from spawning is impermissible.⁹ The preferred alternative permits less than 10% of the river to flow down its historic channel to the Knik Arm, the smallest amount of any proposed alternative.¹⁰

High flows are essential to mimic beneficial flooding. Seven of the nine alternatives proposed much more water during high flows, yet the Draft Program Plan settles on the lowest water discharge for channel maintenance flows of all discharges proposed. The maintenance flow regime in the preferred alternative is severely inadequate because it fails to return the river to its natural flow. The 220 cfs maximum flushing flows in the Draft Program is less than 20% of the average flushing flows of 1,402 cfs that USFWS estimated would be necessary to recreate the flows that historically supported the natural fishery and created the natural river channel and off-channel habitat.¹¹ Worse, the Draft Program imagines the peak flow for just a few hours for just three out of every ten years before returning to conditions that approximate a severe drought. NOAA Fisheries concluded that the proposed flushing flows in the Draft Program “are unlikely to modify substrates and support habitat complexity in a meaningful way after nearly a century of limited impactful flow events.”¹² The chosen channel maintenance flow hardly mitigates for the Eklutna River’s deprivation of almost a century of flooding with a maximum recorded value of approximately 3,000 cfs.¹³

The AWWU Portal proposal provides no solution for the complete blockage of salmon reaching the extensive lake spawning habitat required by sockeye salmon (which was the key driver for the Agreement in the first place) and 15 miles of upper tributaries spawning habitat above the lake that is

Habitat Flow Assessment (July 14, 2019) <https://www.tu.org/wp-content/uploads/2019/06/Upper-Eklutna-FlowAssessment-071419-1.pdf>.

⁸ Eklutna Draft Fish and Wildlife Program at 39-40.

⁹ See Divestiture Report at 19.

¹⁰ Eklutna Draft Fish and Wildlife Program, 39, 49.

¹¹ U.S. Fish and Wildlife Service, Upper Eklutna River Survey Preliminary Fish Habitat Flow Assessment.

¹² NOAA Fisheries, Comment Letter to Draft Fish and Wildlife Program (Dec. 5, 2023).

¹³ McMillen Jacobs Associates, Initial Information Package at 77 (Sept. 2020)

https://eklutnahydro.com/wpcontent/uploads/2020/10/200928-Eklutna-IIP_FINAL.pdf

highly amenable to Chinook and coho salmon.¹⁴ Without a connection to Eklutna Lake, restoring those key spawning grounds and habitat is impossible. The Project Owners admit in the Draft Program that “no change in sockeye rearing habitat is anticipated.”¹⁵ The proposed nominal flow releases from the AWWU Portal, which represent less than 10% of the inflows to Eklutna Lake, will only minimally enhance Chinook and coho salmon and their habitat in the lower Eklutna River and bear no resemblance to historic flows.¹⁶

As such, we do not support the AWWU Portal alternative because it does not provide for a connected ecosystem, as it:

- Fails to remedy the harms to sockeye salmon and their spawning habitat that instigated the Agreement and Program process;
- Leaves one mile of dry riverbed that prevents fish from reaching Eklutna Lake;¹⁷
- Blocks access to the majority of sockeye, Chinook, and coho salmon spawning and rearing habitat in the lake and its tributaries; and
- Delivers inadequate flows for fish below the Eklutna Lake dam.¹⁸

The Project Owners are not providing decision-makers and the public with the full range of alternative solutions and mitigation measures to meet the Agreement requirements. The Project Owners must select an alternative that would restore connectivity of Eklutna Lake and upper tributaries to the lower river.

The Program’s Analysis of Non-Salmonid Wildlife is Severely Inadequate

The Agreement’s protection, mitigation, and enhancement purpose is not limited to salmon but instead includes all fish and wildlife impacted by the Project. Reducing the ecological function of the tidal wetlands, lower river, lake, and upper tributaries from the Project’s impacts reduces the health of fish and wildlife throughout the watershed. However, the Draft Program is not built upon any surveys or studies of marine mammals and its consideration of terrestrial and avian wildlife and habitat is severely inadequate.

The wildlife habitat survey study area boundary was limited to the lower end of the lake, the current river channel corridor, and a section of the wetlands at the river mouth.¹⁹ This study area boundary is insufficient and should have included the entire Eklutna watershed, including the upper tributaries, the

¹⁴ See, e.g., Native Village of Eklutna, Eklutna Lake and Tributaries Salmon Habitat (2022) <https://static1.squarespace.com/static/5f52cd19995bf84b22653379/t/630683349fc05e329044d6bf/1661371211807/Lake+%26+Tributaries+Habitat.pdf>; See also e.g., McMillian Jacobs Associates, Eklutna Lake Aquatic Habitat and Fish Utilization, Year 2 Study Report Draft (2023) <https://eklutnahydro.com/wp-content/uploads/2023/04/Draft-Eklutna-Lake-Habitat-and-Fish-Y2-Report.pdf>; See also, e.g., Native Village of Eklutna, TWG 2021-2022 Final Report (Jul. 23, 2023).

¹⁵ Eklutna Draft Fish and Wildlife Program at Appendix B-4 (emphasis added).

¹⁶ McMillen, IIP at 77

¹⁷ Eklutna Draft Fish and Wildlife Program at 46 (“Release of water from the portal valve will provide year-round flow to 11 of the 12 river miles.”).

¹⁸ See, e.g., USFWS, Upper Eklutna River Survey Preliminary Fish Habitat Flow Assessment; see also, e.g., Trout Unlimited, Eklutna River Workshop: Summary of Outcomes, Recommendations, and Future Needs at 4-6.

¹⁹ ABR, Inc., Eklutna Hydroelectric Project Wetlands and Wildlife Habitat Study Report Draft at 3 (Mar. 2023) <https://eklutnahydro.com/wp-content/uploads/2023/04/Draft-Eklutna-Wetlands-and-Wildlife-Habitat-Report.pdf>.

entire lake, and the off-channel stream areas in the lower river valley, given the Project harms to the whole Eklutna watershed ecosystem. Because of the limited study area, the wildlife analysis could not fully consider the protection, mitigation, and enhancement from all the alternatives, including the potential restoration of habitat from increasing flows and reconnecting the lower river to the lake and upper tributaries. Terrestrial and avian wildlife and habitat studies were primarily conducted via aerial surveys and literature reviews, both which have issues regarding their accuracy and the amount of place-specific detail they can provide.²⁰ A recent scientific review of the accuracy of wildlife aerial surveys stated that aerial surveys can be an efficient platform to collect observational counting data “across large spatial areas,” but which are far less well-suited for specific and small-scale geographies like the Eklutna survey area.²¹ Furthermore, the review noted common errors such as “nondetection, counting error, and species misidentification” that if not adequately addressed at all stages of the study “can provide data that obscure animal-environment relationships or introduce biases into inferences.”²² The Project Owners provide no details or assurances that their limited surveys addressed these common errors. Furthermore, aerial and other surveys for wildlife were extremely limited. For example, only one day of raptor aerial surveys were completed, four days of migratory shorebird and waterfowl surveys were completed, and three days of moose surveys were completed, all during 2022.²³ These surveys would not account for any annual variation in wildlife abundance or timing in the Eklutna watershed, as well as seasonal access limitations, among other issues. Wildlife habitat analysis relied on historic and current aerial photography with no ground vegetation surveys completed.²⁴ Scientific literature on Alaska wildlife and habitat is rarely area specific and is therefore not necessarily a valid representation of species using the Eklutna watershed either for their full lifecycles or for their migration routes or travel corridors.

Overall, the Plan recognizes that increasing the Eklutna River’s flow below the dam will “directly or indirectly benefit several ecologically and/or culturally important wildlife species” such as wolves, moose, raptors, and bears.²⁵ Yet, because of the severe lack of adequate baseline data, it is impossible to truly analyze and understand how the different alternatives would impact and potentially benefit all wildlife and their habitat and to what degree. For example, even though listed in the “observed or expected” wildlife list, the Draft Program fails to consider imperiled species like the Little brown bat (*Myotis lucifugus*) that rely on the Eklutna watershed and for which mitigation and enhancement of their foraging habitat in the lower Eklutna River valley, which is currently harmed by the Project, could be improved by increasing flows and rebuilding off channel habitat in the lower river.²⁶ The Draft Program also fails to analyze why certain wildlife populations appear to be below normal levels. For example, the Summary of Study Results notes that “[w]aterfowl and shorebird numbers in the study

²⁰ Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage (“Project Owners”), Eklutna Hydroelectric Project Draft Summary of Study Results at 46-50 (Oct. 2023) <https://eklutnahydro.com/wp-content/uploads/2023/11/2023-10-27-Eklutna-Draft-Summary-of-Study-Results.pdf>.

²¹ Davis, Kayla L. et al., Errors in aerial survey count data: Identifying pitfalls and solutions, 12 Ecology and Evolution e8733 (Mar. 18, 2022) <https://onlinelibrary.wiley.com/doi/10.1002/ece3.8733>.

²² Id.

²³ Eklutna Draft Summary of Study Results at 46-49.

²⁴ Id. at 42-43; see, Email from Terry Schick, ABR Inc., to Carrie Brophil, NVE (Nov. 22, 2022 at 11:27AM) (on file with NVE).

²⁵ Eklutna Draft Fish and Wildlife Program at 53.

²⁶ ABR Inc., Eklutna Hydroelectric Project Terrestrial Habitat Study Report Draft at 23 (Mar. 2023) <https://eklutnahydro.com/wp-content/uploads/2023/04/Draft-Eklutna-Terrestrial-Wildlife-Report.pdf>.

area were moderate and low, respectively, during the field surveys” and that “[s]horebirds were noticeably absent during the spring surveys.”²⁷ This may be an example of a system that is in depression from nearly a century of harms from hydroelectric dams. These examples, and many others, highlight the Draft Program’s inadequacies in considering and rigorously analyzing how the different alternatives would impact all non-salmonid fish and wildlife in the Eklutna system and whether the preferred alternative provides adequate mitigation and enhancement.

Regarding marine mammals, the Draft Program fails to consider the protection, mitigation, and enhancement of Cook Inlet beluga whales (*Delphinapterus leucas*), one of the nation’s most critically endangered marine mammals. The best available science shows that Cook Inlet belugas could significantly benefit from increased salmon runs in the Upper Cook Inlet. Given the mouth of the Eklutna River is within designated critical habitat in upper Cook Inlet where the majority of the Cook Inlet beluga population forages during the summer, the critically endangered whales should be a primary concern for the Program.²⁸ The 2011 critical habitat designation for Cook Inlet belugas identified shallow intertidal and subtidal waters of Cook Inlet in close proximity to medium to high flow anadromous fish streams along with four species of Pacific salmon (Chinook, sockeye, chum, and coho) as essential to the beluga’s conservation (also known as Primary Constituent Elements).²⁹ NOAA Fisheries’ 2016 *Recovery Plan for the Cook Inlet Beluga Whale* identifies prey availability as a threat of medium concern for their recovery.³⁰ NOAA Fisheries acknowledges the heightened importance of prey availability, specifically Pacific salmon, for conserving Cook Inlet beluga whales. NOAA Fisheries has also identified Cook Inlet beluga whales as one of the species most at risk of extinction, and in their Species in the Spotlight, 2021-2025 Action Plan, state that, “[s]urvival and recovery of Cook Inlet beluga whales depend on an adequate quantity, quality, and accessibility of prey resources.”³¹ In a recent notice to issue an Incidental Harassment Authorization (IHA) proposal from the Port of Alaska, NOAA Fisheries noted that, “Pacific salmon represent the highest percent frequency of occurrence of prey species in CIBW stomachs.”³² The notice highlighted that rich foraging areas to the north of the Port of Alaska, including the Eklutna River, are important to belugas and that the whales correlate their movements into Knik Arm around the timing of the salmon runs in those rivers.³³ A recent 2023 study by Wild et al. delineated portions of Cook Inlet, including Knik Arm and the mouth of the Eklutna River, as a Biologically Important Area (BIA) for the small and resident population of Cook Inlet beluga whales based on scoring methods outlined by Harrison et al. in 2023.³⁴ The best available science shows that restoring abundant salmon runs may be one of the key strategies available for Cook Inlet beluga recovery by creating more foraging opportunities for belugas in upper Cook Inlet. The results of a 2020 study by Norman et al. suggest that “reproductive success in [Cook Inlet belugas] is tied to salmon abundance” in the Deshka

²⁷ Eklutna Draft Summary of Study Results at 47.

²⁸ 76 Fed. Reg. 20,180 (Apr. 11, 2011).

²⁹ 76 Fed. Reg. 20,203, 20,214 (Apr. 11, 2011).

³⁰ National Marine Fisheries Service, *Recovery Plan for the Cook Inlet Beluga Whale* at III-13 (2016).

³¹ NOAA Fisheries, *Species in the Spotlight – Cook Inlet Beluga Whale, Priority Actions 2021-2025* at 14 (Apr. 21, 2021).

³² 88 Fed. Reg. 76588 (Nov. 6, 2023).

³³ *Id.*

³⁴ Wild, Lauren A. et al., *Biologically Important Areas II for cetaceans within U.S. and adjacent waters – Gulf of Alaska Region*, *Front. Mar. Sci.* 10:1134085 (May 5, 2023); Harrison, Jolie, *Biologically Important Areas II for cetaceans within U.S. and adjacent waters – Updates and the application of a new scoring system*, *Front. Mar. Sci.* 10:1081893 (Mar. 14, 2023).

River, which is also located in upper Cook Inlet near Knik Arm and the Eklutna River.³⁵ That study showed that “if salmon runs remained at their current levels, the [Cook Inlet beluga] population would likely continue its current slow decline,” yet the study found that “if Chinook salmon increased 20% or more, the current decline would likely be reversed.”³⁶ Furthermore, the study simulations found that “doubling the salmon abundance would be sufficient to allow recovery of the population regardless of impacts from other threats.”³⁷ The study noted that while Chinook are the most nutritionally important salmon species for Cook Inlet belugas, belugas still rely on other salmon species as important prey.³⁸ Moreover, a recent 2023 study by McHuron et al. found that if there is enough prey available for Cook Inlet belugas, the whales can withstand other intermittent stressors, concluding that increasing prey availability increases the beluga’s resiliency to threats.³⁹ Another recent 2023 study by Warlick et al. stated that “aerial survey data suggest that the [Cook Inlet beluga] population continues to decline[, and the] leading hypotheses include reduced prey availability [...]”⁴⁰

The proposed nominal flow releases from the AWWU Portal will only minimally enhance Chinook and coho salmon and their habitat in the lower Eklutna River. The AWWU Portal provides no solution for the complete blockage of salmon reaching the extensive lake spawning habitat required by sockeye salmon and miles of upper tributaries spawning habitat above the lake that is highly amenable to Chinook and coho salmon, both of which are primary forage species for Cook Inlet belugas.⁴¹ Without connection to Eklutna Lake, protecting, mitigating, and enhancing those key spawning grounds and habitat is impossible. In turn, the mitigation and enhancement for Cook Inlet beluga whales are likely to be minimal as well. Furthermore, no analysis was completed for how the other alternatives considered would benefit Cook Inlet belugas. The Draft Program’s severely inadequate analysis of non-salmonid fish and wildlife fails to meet the purposes of the Agreement and the standard of a similar federal process, and severely inhibits the Governor’s ability to make an informed decision.

Conclusion

The Eklutna Project is the limiting factor preventing the restoration of the Eklutna River that flows from its headwaters to its confluence with the Knik Arm. Plainly, the Project Owners’ Draft Program to continue to promote lack of connectivity of the ecosystem is inadequate to mitigate the Project’s harms to fish and wildlife. Adequate and equitable fish and wildlife protection, mitigation, and enhancement, as required by the Agreement, requires the lake and upper tributary streams to be connected to the lower river and adequate flows for salmon to thrive. As such, we request that the Project Owners

³⁵ Norman, S. et al., Relationship between per capita births of Cook Inlet belugas and summer salmon runs: age-structured population modeling, *Ecosphere* 11:1 (2020).

³⁶ Id. at 1, 9.

³⁷ Id. at 10.

³⁸ Id.

³⁹ McHuron, Elizabeth A. et al., Modeling the impacts of a changing and disturbed environment on an endangered beluga whale population, 483 *Ecological Modeling* 110417 (Sept. 2023).

⁴⁰ Warlick, A.J. et al., Identifying demographic and environmental drivers of population dynamics and viability in an endangered top predator using an integrated model, *Anim. Conserv.* (Oct. 6, 2023).

⁴¹ See, e.g., Native Village of Eklutna, Eklutna Lake and Tributaries Salmon Habitat (2022)

<https://static1.squarespace.com/static/5f52cd19995bf84b22653379/t/630683349fc05e329044d6bf/1661371211807/Lake+%26+Tributaries+Habitat.pdf>; See also, McMillian Jacobs Associates, Eklutna Lake Aquatic Habitat and Fish Utilization, Year 2 Study Report Final (2023) https://eklutnahydro.com/wp-content/uploads/2023/06/Eklutna-LakeStudy-Y2-Report_FINAL.pdf; See also, Native Village of Eklutna, TWG 2021-2022 Final Report.

reconsider their proposed alternative, and instead promote methods which ensure a connected ecosystem.

On behalf of our organization, our members and supporters, and Alaska's wildlife, we appreciate your consideration of our comments.

Sincerely,



Nicole Schmitt
Executive Director

From: [Chantal de Alcuaz](#)
To: [Sam Owen](#)
Subject: Comment on Eklutna Hydroelectric Project
Date: Monday, February 19, 2024 6:36:52 PM

The Alaska Center
808 E St, Suite 100
Anchorage, AK 99501

To the Owners of the Eklutna Hydroelectric Project:

The Alaska Center is a 501(c)4 advocacy nonprofit organization, with over 50 years of history, based in Anchorage. We have tracked this mitigation process since 2019, in coalition with partners, including the Native Village of Eklutna and Trout Unlimited.

Our organizational vision is a thriving, just, and sustainable Alaska for future generations. In our view, the proposed Draft Fish and Wildlife Program is antithetical to that vision; it is unjust, unsustainable, and will fail to enhance the Eklutna River as is required by the 1991 Fish and Wildlife Agreement.

The Draft Program fails to acknowledge the needs of salmon; the proposed flows of 27 cfs in the winter and 40 in the summer are inadequate to bring back populations at even a fraction of what once existed. It is difficult to believe that a mere 3% of historic flows would be considered “mitigation and enhancement.” This proposition is even more difficult to believe when compared to flows proposed by US Fish and Wildlife Service and National Marine Fisheries Service of 75 cfs in the winter and 160 in the summer. The fish deserve better, and an entire ecosystem that was once dependent on the vital nutrients provided by this keystone species deserves better. This proposition fails to rectify the harm done to the land for the last 100 years.

In addition to the flaws in the proposal itself, we have significant concerns about the process. As an advocacy organization, we care deeply about the ability of the public to comment on and be involved in decisions that directly affect us. One would hope that this mitigation process, which will lead to impacts on municipality taxes and utility rates, would encourage robust public participation. To be frank, we were shocked to learn that at the meetings, hosted by the owners group, the public comment would not be received in an open forum as is usually the case in such proceedings. It was only more disheartening to learn that the public felt so disregarded, that only 17 out of 230 attendees left comments.

Later in the process, we were heartbroken to learn that the utility companies signed a binding term sheet with the Anchorage Water and Wastewater Utility to use their portal in October 2023, prior to hearing the public’s comments on the issue. Throughout this process, we have heard members of the public express that they wish to hear the sentiments of other member-owners on this issue. The public comment process did not allow for member-owners to hear each other, nor to hear directly from a party that is deeply impacted, The Native Village of Eklutna.

The Native Village of Eklutna has suffered immense harm as their river and fish were stolen from them in order to power Anchorage. Eklutna people have consistently helped Anchorage by providing land for schools and a power plant, and resources for the railroad. The Native

Village of Eklutna was not an original party to the dam agreement, nor are they a hydro owner—which is itself an injustice—but they are an important stakeholder in this mitigation process. The utility owners have consistently held meetings with the Native Village of Eklutna, and subsequently ignored their desires. The Native Village of Eklutna has consistently stated they want fish passage from the lake to the ocean. The mitigation process is a historic opportunity that should not be taken for granted. It is time for the utility owners and the community of Southcentral as a whole to take this crucial step toward righting a historic wrong of colonization.

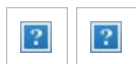
Across the country, dams are being torn down as the harm they've inflicted upon the fish, land, and native peoples is being recognized. As Alaskans, we have an opportunity to right a grievous wrong and re-introduce a salmon run within upper Cook Inlet. We have an opportunity to protect the incredible natural resources within our state and prevent this land from being razed as it has in the Lower 48. We cannot fail our salmon as they have in Washington, Oregon, California, and Idaho. We need to do whatever we can to improve fisheries and give salmon the greatest chance of survival. This is a generational project. We cannot afford to think in the short term, as we have done for so long. There is an opportunity for fish to return, for our children and our grandchildren. The time is now. Renewable energy, salmon runs, and tribal sovereignty are not mutually exclusive. This river needs adequate flows and connection to the lake, morally and legally, and the proposed plan is insufficient to achieve these objectives.

Sincerely,

The Alaska Center



Chantal de Alcuaz
Co-Executive Director
Cell: (907) 250-9621
she/her/hers



Dena'inaq elnen'aq' gheshtnu ch'q'u yeshdu. (Dena'ina)

I live and work on the land of the Dena'ina. (English)

Translation by Joel Isaak and Sondra Shaginoff-Stuart



CHUGACH STATE PARK CITIZEN ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

Dear Eklutna Fish & Wildlife Program Development Team:

Municipality of Anchorage; Attn: Kolby Hickel
Chugach Electric Association; Attn: Andrew Laughlin
Matanuska Electric Association; Attn: Tony Zellers
McMillen Jacobs Associates; Attn: Samantha Owen
Hydro Regulatory Services; Attn: Steve Padula

The Chugach State Park Citizen Advisory Board (CAB) is a volunteer board composed of members of the public appointed by the Director of the Division of Parks & Outdoor Recreation. Among the CAB's purposes is a responsibility to "inquire into matters of community interest relating to State Parks and outdoor recreation". Furthermore, five primary purposes are outlined for Chugach State Park in statute (AS 41.21.120-41.21.125):

1. To protect and supply a satisfactory water supply for the use of the people.
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas.
3. To protect areas of unique and exceptional scenic value.
4. To provide areas for the public display of local wildlife.
5. To protect the existing wilderness characteristics of the easterly interior area.

We appreciate that the Program Development Team's mandate to select an alternative to fulfill the responsibilities of the 1991 Fish & Wildlife Agreement is an extremely complex task with a variety of implications for the Project Owners, Chugach State Park, the Native Village of Eklutna and the general public. The alternative implemented will have financial, cultural, recreational and environmental impacts for the next 35 years. While members of the CAB bring a diverse set of expertise and are personally sensitive to the wide array of potential implications of the various selected alternatives, as a board we remain focused on the potential impacts to Chugach State Park. Keeping both the CAB's purposes and the Park's purposes front of mind we respectfully submit the following comments on the 2023 Draft Fish and Wildlife Program.

We found the recreational study and subsequent discussion of impacts to recreation to be inadequate. While the recreational study did examine the *existing* quantity, frequency, location and type of recreation in the project area, it failed to sufficiently analyze how the park - and recreation - would be affected by the different alternatives. It also fails to account for future growth in recreation at Eklutna Lake over the project lifetime.

While both the Draft Summary of Study Results (Draft Study) and Draft Fish and Wildlife Program (Draft Program) acknowledge that substantial erosion has occurred to ~3.1 miles of the Eklutna Lakeside Trail - a direct result of the Project Owners' management of lake levels combined with wind caused wave action - there is no mention as to how to mitigate future trail damage. This mitigation is the responsibility of the Project Owners as laid out in the 1991 Agreement, and whichever alternative is selected should include a plan to

protect recreational assets such as the Lakeside Trail. Trail erosion primarily occurs at high lake levels when the lake is full (elevation 871 feet) and spilling via the ungated spillway, which has occurred 10 times since the dam was constructed in 1965 (Draft Program, Table 1-1, p.15). One infrastructure modification to the existing dam we encourage to be revisited is the fixed wheel gate. This would allow for more rapid drawdown of lake levels when the lake is full, preventing future damage to the Lakeside Trail. The fixed wheel gate also has the added benefit of allowing for increased channel maintenance flows, and is the preferred infrastructure modification to the existing dam favored by all entities except Alaska Division of Natural Resources and the Project Owners (Draft Program, Table 2-1, p.37-38).

The CAB is also concerned by the lack of specificity as to how the Project Owners will fulfill their obligation to contribute financially to needed repairs to recreation infrastructure. The Draft Study estimates the cost of Lakeside Trail Improvements to range from \$860,000 to \$3,441,000 (Table 2.9, p.60). However, the Draft Program abdicates responsibility for mitigation to trail damage by citing one time funding secured by a nonprofit partner (Section 3.3.2, p.57; Section 4.9 p.75). Unfortunately, the \$234,000 in state capital funds approved by the legislature in 2023 represents a small fraction of the estimated repair costs and a very short term fix for only a limited section of dangerous, badly damaged trail. This does not absolve the Project Owners from the obligation to develop a long term logistic and financial plan to repair the remainder of trail damage (as identified in the Draft Study, Section 2.11, p.53), prevent future damage, and maintain the integrity of trails and infrastructure in the future. Furthermore, there is a rather large discrepancy between estimated cost cited in the Draft Study referenced above versus the Draft Program. The total median cost cited in the Draft Program (Appendix D, Table 2-1) was \$1,347,100 less than that cited in the study results. This discrepancy should be reconciled.

While we acknowledge that the Project Owners are bound by the schedule laid out in the 1991 Agreement, multiple partners, including the Anchorage Assembly, have called for a delay to allow for time to better consider all alternatives. A delay would also allow the Project Owners to fully consider the dam removal alternative supported by the Eklutna Valley Community Council and the Native Village of Eklutna. The CAB supports a delay to allow the Project Owners and all interested parties to better analyze this option. With a 35-year implementation timeline, all parties will have to deal with the consequences of the selected alternative for decades to come.

Regardless of the alternative selected, the CAB expects the Project Owners to develop a plan to mitigate impacts to any recreational assets including, but not limited to, damage to the Eklutna Lakeside Trail. Additionally, in partnership with Chugach State Park and nonprofit partners, the Project Owners should establish an agreement and a corresponding fund to pay for assessments and repairs of existing and potential future damage to recreational assets over the lifetime of the project. The CAB recommends that the Project Owners make regular contributions to an approved financial vehicle equal to - at a minimum - the median estimated cost of trail repairs cited in the Draft Study. This financial burden should not be passed off to Chugach State Park, the State of Alaska or other nonprofit partners as it has in the past.

Sincerely,



Haley Johnston, Board Chair
Chugach State Park Citizen Advisory Board

February 19, 2024

Samantha Owen
Senior Regulatory Consultant
McMillen Inc.
2607 Western Ave, Unit 360
Seattle, WA 98121
info@eklutnahydro.com

Re: Support of Eklutna Salmon and a Free-Flowing Eklutna River

Dear Decision-Makers,

I am a resident of Upper Cook Inlet and an MEA ratepayer. I strongly believe that fish passage should be restored on Eklutna River all the way to Eklutna Lake and beyond. The Native Village of Eklutna, the National Marine Fisheries Service and the US Fish and Wildlife Service all have encouraged actions toward the implementation of a restored Eklutna River.

I fully support the Native Village of Eklutna's vision for Eklutna Watershed:

- The Eklutna River running freely, continuously, and naturally from its glacial headwaters through its dramatic canyon and its productive estuary to the marine waters of Cook Inlet.
- All five species of Pacific salmon (King, sockeye, silver, pink & chum) again swimming freely from Knik Arm through the entire length of the Eklutna River to their spawning grounds at Eklutna Lake.
- An abundant salmon fishery that supports the Eklutna Dena'ina and the people of Southcentral Alaska.
- Eklutna Lake, centerpiece of Chugach State Park, full to its natural lake level to support sockeye salmon shore spawning and human-powered recreation.
- An Eklutna River that rebalances the needs of fish, the Eklutna Dena'ina, drinking water for Anchorage, and low-carbon power production.

I fully support the comments and position of the Native Village of Eklutna (NVE) as presented in their December 4, 2023 comments on the Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage ("Project Owners")'s Eklutna Hydroelectric Project Draft Fish and Wildlife Program. NVE's letter clearly presents the biased inadequacies of the Draft Program. The comments by NVE, the National Marine Fisheries Service and the US Fish and Wildlife Service all point out that the Draft Program fails to meet the fundamental purpose of the 1991 Eklutna Fish and Wildlife Agreement.

Please restore fish passage to Eklutna River to support salmon and other fish and wildlife, including Cook Inlet Beluga Whales.

Sincerely,
Jessica Winnestaffer

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Kyle Foster](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 5:46:32 PM

To Whom It May Concern,

I am writing to express my strong opposition to the proposal known as the "AWWU Portal," put forth by the group identified as The Owners. This proposition, aimed at mitigating the Eklutna River, is insufficient and fails to address the critical needs of the river's ecosystem, particularly concerning the thriving of all five species of salmon that historically inhabited those waters.

The 1991 agreement, to my understanding, was established with the intent of preserving the Eklutna River's ecosystem in a manner that mirrors its natural state as closely as possible. The proposal in question deviates significantly from this intention, offering a solution that undermines the ecological and cultural heritage of the area. The reliance on the AWWU Portal as a mitigation strategy overlooks the importance of maintaining a balanced and diverse salmon population, which is essential not only for the ecosystem but also for the cultural fabric of our community.

It is indeed challenging to provide concrete evidence of the species present in the Eklutna River prior to its current state. However, the oral histories and faithful stories passed down by the indigenous people of this region offer invaluable insights into the river's original biodiversity. These narratives highlight the presence and significance of all five salmon species, underscoring the importance of restoring the Eklutna River to a state that supports their lifecycle and migration.

Furthermore, the economic implications of a river ecosystem rich in salmon cannot be overstated. The Kenai River, with its abundant sockeye salmon population, serves as a vivid example of how such ecosystems can become economic staples for their communities. It showcases the potential economic benefits that could be realized in Anchorage by emulating a similar focus on ecosystem health and salmon population support.

In addition to the ecological and economic benefits, the construction of a new dam with an effective fish passage represents a viable alternative that aligns more closely with the goals of the 1991 agreement. Such an infrastructure project would not only facilitate the migration and repopulation of all salmon species but also stimulate our local economy by creating job opportunities. This approach offers a holistic solution that respects our environmental, cultural, and economic needs.

I firmly believe that the AWWU Portal proposal falls short of the comprehensive and sustainable solution required to restore the Eklutna River to its natural glory. It is imperative that we explore alternatives that prioritize the return and flourishing of all five salmon species, thereby honoring the legacy of our indigenous communities and securing a prosperous future for Anchorage.

I urge you to reconsider the current proposal and to seek a path forward that truly reflects the original spirit of the 1991 agreement. Let us commit to a solution that fosters a thriving ecosystem, respects our cultural heritage, and leverages the economic potential of our natural resources.

Thank you for your attention to this matter.

Sincerely,

Kyle Foster

From: [Mel Langdon](#)
To: [Sam Owen](#)
Subject: comment on the draft Fish and Wildlife Program
Date: Monday, February 19, 2024 7:21:29 PM

Dear Project Owners,

Thank you for the opportunity to comment on the draft Fish and Wildlife Program, prepared in response to the 1991 agreement, when you became co-owners of the Eklutna Project.

I do not believe this draft Program accords with the terms of the agreement and I urge you to expand the suite of considered alternatives and reevaluate the adequacy of the draft Program. It does not fully quantify the impacts of the project on fish and therefore the mitigation measures do not fully address these impacts.

1. Need for a FERC license. The 1991 agreement was put in place to "...obviate the need for the Eklutna Purchaser and AEA to obtain FERC licenses." This implies that the fish and wildlife protections should accord at least what a FERC license would require. The federal owner got out of its obligation and shifted it to you, the co-owners. We, who have benefited from the project, got a sweet deal for 35 years. Now the piper needs to be paid. That is, proper measures that would be required under a FERC license for this project must be put in place.

The Eklutna hydropower project has dried up 11 miles of Eklutna River for at least 60 years. Apparently there is no baseline for conditions before the dam(s) were built. This does not mean that the present situation serves as baseline or even that the condition with the lower dam (since removed) in place served as baseline. The agreement says the Fish and Wildlife Program shall consist of measures for the protection, mitigation of damages to, and enhancement of fish (including relating to spawning grounds). You should **look seriously at the comments from NOAA and USFWS for guidance on changes to the Fish and Wildlife Program that will satisfy the FERC requirements** for hydropower project licensing.

In parts of the lower 48 states, hydroelectric dams have been removed because satisfying the FERC relicensing requirements is too onerous. That seems to be exactly the case here.

2. Condition of the hydropower plant itself. The draft Program proposes a \$44 million investment at the intake to the penstock to continue hydropower production at the 60-year old plant. The plant supplies a minor percentage of electricity for Chugach and MEA customers. Given that Eklutna hydropower only accounts for 3% of the power supplied by Chugach Electric, this project does not represent a large share of the power supply. **What is the condition of the power plant and does it warrant such an investment for the small percentage of power it supplies?** Does the plant itself need improvements and, if so, what is the price tag for those? Can that money be better spent on renewable sources that do not depend on continued dewatering of formerly productive salmon habitat?

3. Anchorage's potable water supply. Recent comments by AWWU and by the Assembly's consultant indicated that effects of the draft Program on Anchorage's water supply from Eklutna Lake have not been fully considered. It appears that AWWU built its water treatment plant intake pipeline in the river bed, sometime in the same time period that the sale of the power plant to the owners was being negotiated (1988-1989, according to the timeline in the January public meeting presentation). If this pipeline was not constructed to consider different future conditions (e.g., protection for scour from streamflows and at-grade crossing rather than bridges), then what kind of agreement was actually made with the owner and AWWU? Even if restoring flows in the riverbed where the pipeline was buried was not considered in the design, that does not seem to be an adequate reason not to consider rewatering the river bed. The geomorphologist consultant at the Public Meeting in Anchorage specifically told me that they were only asked to evaluate the geomorphic effects of certain (those currently proposed) flows (e.g., not historic or higher flows) and also that they did not evaluate potential depth of scour for any flows. This suggests that the full range of flows or impacts on the pipeline has not been considered, even though there was a comment on an earlier study from a former AWWU general manager specifically addressing a concern about the effects of scour. Apparently we can only wring our hands and say the pipeline will be washed out, without evaluating the likelihood of and costs to prevent this. Finally, **what are the content and conditions of the most recent agreement between the owners and AWWU** that has not been made public and was the subject of a recent executive session of the Municipal assembly?

4. Obligations to Indigenous peoples and complicity with past injustices. I have been a rate payer to ML&P, and subsequently a Chugach Electric member, since 1994. **I have benefited from low electricity rates and I deeply resent being complicit in this project.**

Touting the Eklutna hydropower plant as an example of Chugach's renewable energy sources disregards the detrimental effects of the plant on the environment. It completely ignores the fact that the federal government has not adequately compensated the Eklutna tribe and gave the benefit of the stolen goods to the current owners and their customers. As a rate payer and member of the Chugach Electric cooperative, as well as a rate payer and consumer of water supplied by AWWU, I believe that the owners have an obligation to the inhabitants at the time the dam was constructed and the water diverted, and to their descendents, to correct 90 years of benefiting from trespass.

5. Take a pause. **Seriously consider and honor the proposition offered by The Native Village of Eklutna** in its December 4, 2023, letter commenting on the draft Program. This is a generous deal to the owners, allowing them time to develop alternative electric power sources and better evaluate the best use of the \$44 million of investment suggested by the draft Program. Given the looming gas shortage for electrical generation and the urgent need to develop new energy sources for generating facilities, this has to happen anyway.

Sincerely,

Margaret Langdon



NATIVE MOVEMENT

Building Healthy & Sustainable Communities

www.nativemovement.org

February 19, 2024

Chugach Electric Association, Inc.
Matanuska Electric Association, Inc.
Municipality of Anchorage

RE: October 2023, Eklutna Hydroelectric Project, Draft Fish and Wildlife Program

Submitted via: info@eklutnahydro.com

Native Movement¹ is pleased to offer comment on the October 2023 Eklutna Hydroelectric Project, Draft Fish and Wildlife Program. Native Movement is an organization dedicated to building people power rooted in an Indigenized worldview. Our mission is to foster healthy, sustainable, and just communities for all, with a particular emphasis on upholding social justice, Indigenous Peoples' rights, and the rights of Mother Earth. At Native Movement, we prioritize grassroots-led projects that align with our vision and values. We recognize the interconnectedness of environmental stewardship, cultural preservation, and social equity. It is within this framework that we engage in efforts to protect and restore our natural environment, promote traditional knowledge, and advocate for policies that prioritize the well-being of both present and future generations.

Native Movement stands with the Native Village of Eklutna, local community councils, and others who support the restoration of the Eklutna Lake and River ecosystem.

Proposed Eklutna River Flows

The Project Owners are proposing to release year-round instream flows of 27 cfs in the winter and 40 cfs in the summer from Eklutna Lake into Eklutna River from a new Eklutna River Release Facility which will be located adjacent to the AWWU portal valve. The Project Owners claim this will water 11 of 12 miles of the Eklutna River.

Native Movement concurs with growing public sentiment that a stream flow rate of between 27 to 40 cfs is marginal, and whether a flow rate of between 27 to 40 cfs is adequate would likely depend on many factors that would have to work in unison. Some species of salmon may be more adaptable to lower flow rates than others. Species like pink salmon or chum salmon might

¹ <https://www.nativemovement.org/what-we-do>

be more tolerant of lower flow conditions compared to species like Chinook or Coho salmon. At the proposed marginal flow rate it seems the quality of the water would be very critical for salmon survival and reproduction. Even if the flow rate is suitable, the water must have adequate oxygen levels, be free from pollutants, and maintain appropriate temperatures that salmon prefer. Flows between 27 to 40 cfs may be sufficient for some aspects of salmon habitat, such as migration corridors or summer rearing habitat, but it may not provide enough space or suitable conditions for all life stages, especially spawning habitat. Salmon require a variety of habitats throughout their life cycle, such as riffles, pools, and areas with suitable substrate for spawning. It is possible the proposed flows of between 27 to 40 cfs may only allow for limited stream habitat types.

Removing the Eklutna Dam

Native Movement is convinced that full restoration is consistent with the existing 1991 agreement. If the Tribe and the public demand justice for restoration, then it seems reasonable and consistent with the 1991 agreement to consider full restoration. The relevant language of the 1991 agreement is as follows: *“protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat) affected by hydroelectric development.”*

The statements *“protection, mitigation of damages to, and enhancement of fish and wildlife (including related spawning grounds and habitat) affected by hydroelectric development”* should not exclude restoration because each component—protection, mitigation, and enhancement—contributes comprehensively to fish and wildlife populations and their habitats. Each component—protection, mitigation, and enhancement—addresses different aspects of managing the impacts of hydroelectric development on fish and wildlife; they collectively can easily contribute to the broader goal of restoration. By integrating these components into a strategy, it becomes clear that recovering and restoring fish and wildlife populations and their habitats affected by hydroelectric development is inclusive of full restoration.

Water Rights

The Project Owners have claimed that their Priority of Appropriation gives them a superior claim to water over other users who value a restored Eklutna River ecosystem. Native Movement is not convinced the Project Owners have the right to prevent changes in the condition of water occurrence if the will is to restore an intact Eklutna River ecosystem. Native Movement believes it is within the rights of the Tribe and the public to propose appropriation of water rights for the Eklutna River ecosystem, and the Project Owners cannot prevent subsequent generations from securing water for fish and wildlife. The law may uphold the priority of appropriation principle. However, subsequent appropriators could be allowed to reasonably access water for fish and wildlife even if it means the prior appropriator may need to adapt to the new circumstances or if the will of the public demands water rights be relinquished to benefit fish and wildlife.

1991 Fish and Wildlife Agreement

The Project Owners are claiming the 1991 Agreement is the guiding document they have followed during development of the draft fish and wildlife program. The Project Owners also claim to have fully met the procedural and schedule requirements of the 1991 Agreement. They go on further to say: “The Project Owners have gone well beyond the requirements of the 1991 Agreement in terms of consultation, documentation, and analysis of Draft Program alternatives.” However, the Draft Fish and Wildlife Program puts forth one alternative and rejects many others. During the January 2024 public hearings in Eagle River, it was noted that a dam removal analysis option would be drafted after the comment period closed.

By considering only one alternative in the Draft Fish and Wildlife Program and rejecting many others, there is a lack of transparency in the decision-making process. This has an impact on public trust by giving the impression that decisions are made without considering diverse perspectives or fully informing the public about available options. By compiling a dam removal analysis option after the comment period closes, the Project Owners are excluding a significant alternative after the public input phase, and that creates the perception that decision-makers are not genuinely interested in hearing and incorporating public feedback or exploring all viable options.

Sockeye Salmon

The Project Owners have claimed: *“that no adult sockeye were observed spawning in the lower river during the 2-year study program. Therefore, any attempt to establish a sockeye salmon run in the Eklutna watershed would either rely on sockeye straying from other river systems or intentional stocking efforts.”*

This statement casts doubt on traditional ecological knowledge (TEK) and the potential for sockeye salmon to thrive in the Eklutna watershed. The Project Owners seem to be suggesting that since no adult sockeye were observed spawning during a two-year study program, the dream of witnessing these majestic fish returning home to their ancestral waters seems bleak. However, Tribal Administrator Brenda Hewitt testified at a House Energy Committee hearing on February 8 that the Tribe in fact had seen and tagged sockeye salmon on the river in the last year. She further testified that the Tribe had informed the project owners of their findings, indicating that project owners are either ignoring or actively hiding information contrary to their conclusions. Even if sockeye had not been recently documented in the river, that would not mean that sockeye could not return. Nature has a way of surprising us, and Native Movement is convinced of the TEK already put forth, that once there was enough salmon that one could walk across their backs. It's crucial to remember that the absence of evidence is not evidence of absence. We also must not overlook the prospect of sockeye straying from neighboring river systems. Salmon are nature's wanderers, after all salmon embark on a journey out to Cook Inlet to who knows where, venturing far from their natal stream.

Lack of Free, Prior and Informed Consent, or Even Meaningful Consultation with the Tribe

The Eklutna Tribe has been stewarding the Eklutna River for generations. The original dams were built without the Tribe's input or consent, and they have been devastating to the Tribe's

ability to fish. It is time to stop trampling the rights of the sovereign Eklutna people. Any proposal for the Eklutna Hydro project can only move forward with the free, prior, and informed consent of the Tribe. This process has been none of those. The Tribe does not consent to the proposal. It has not been given the opportunity to work meaningfully with the decisionmakers prior to the utilities publishing a proposal. And the Project Owners have actively worked to hide information from the Tribe and the public. In fact, although the Project Owners claim to have consulted with the Tribe, they have rejected the Tribe's input at every turn and worked to silence the Tribe's voice. They barred the Tribe from speaking at the public hearings and did not invite the Tribe to speak at a recent legislative hearing on the project. There is no free, prior, and informed consent for the project proposal; there is not even real consultation.

Inadequate Public Process

In addition to ignoring the Eklutna Tribe's rights, the Project Owners have not provided adequate public process. In the meetings that were advertised as public hearings, the Project Owners did not allow time for public testimony. Instead, they only allowed the public, including members of the Eklutna Tribe, to submit comments in the back of the room. Across all 6 public meetings, only 17 out of 230 attendees submitted written comments. Many attendees were disappointed to not hear what others in the room thought. The utilities themselves gave a presentation that left out important information and included slanted information. They had McMillen Inc. scientists and engineers available after the presentation to answer questions. However, there were no tables for other experts and parties to the 1991 Agreement, including Native Village of Eklutna, the US Fish and Wildlife Service, or the National Marine Fisheries Service.

Moreover, in putting forward only one alternative, the Project Owners have not provided an adequate basis for the public to weigh in. With the tight timeline that the Project Owners have put themselves on, there is no time for the public to fully develop and analyze a new alternative. The Project Owners should have fully analyzed multiple alternatives, including the Tribe's preferred alternative. Without valid alternatives to consider, the public is hindered in its ability to weigh in meaningfully. Therefore, we support the Anchorage Assembly's request for a two-year pause to complete additional analysis of true river protection, enhancement, and restoration alternatives.

We were also disheartened to learn during a recent special Assembly meeting that a binding agreement between AWWU and the Project Owners to implement the portal alternative was signed prior to the public process and any resolution of differences amongst the Parties to the Agreement. According to the 1991 Agreement, any documents related to the Agreement process should be made available to the public upon request. When the Assembly requested a copy of that agreement, their inquiry was denied, further demonstrating the disingenuous nature of the purported public process.

Conclusion

The Project Owners seem to be suggesting a sense of finality that law and agreements are on their side and their draft fish and wildlife program has met all the requirements. The journey to

establish salmon in the Eklutna watershed may be fraught with challenges, but it is also filled with hope. The first people of Eklutna whose lands were taken from them without consideration for this hydroelectric project deserve to have their voices heard, and all Alaskans deserve to have Eklutna River restoration looked at as a viable alternative.

Thank you for your time and consideration.

Sincerely,

Austin Ahmasuk

From: [Sarah Cronick](#)
To: [Sam Owen](#)
Subject: Strongly oppose the Eklutna Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 12:40:56 PM

Greetings:

I am a born and raised Alaskan who currently resides in Anchorage. I am a paying member of Chugach Electric Cooperative and Municipal Light and Power.

I am writing today to express my strong opposition to the current draft for the Eklutna Fish and Wildlife Program.

I have attended the public meetings to become engaged and learn more, from all involved parties. I keep up with articles published, and read between the lines.

This plan is not backed up with substantiated evidence. It is based on unsubstantiated claims, assumptions, and desires of a few. It does not support the return and survival for not only King Salmon, but all salmon species. The proposed CFS flow rates are not sufficient to support the survival of these fish.

Closed door contracts and an unwillingness to be transparent with the public is a tremendous red flag.

This plan does not include well-rounded data and perspectives of all involved parties. It favors the utility companies, and does nothing to repair relationships with the Eklutna People. It also does not consider other renewable energy options; in fact, there have been reasonable requests made from renewable interests that are met with a clear "no."

What kind of thinking would limit all perspectives? We can do so much better.

It is heartbreaking to learn that utility leaders are serving only certain, short-term interests, rather than looking at the long term needs.

Please consider the young ones, and future generations to come. What is in their best interest? Proceed from there.

Again, I STRONGLY OPPOSE the current plan and am deeply dismayed with the process led by the utilities.

I look forward to hearing how you will do better to be more transparent, clear, and factual moving forward.

Warm regards,
Sarah Cronick (she/her)
907.350.5081

I gratefully acknowledge that I live on the original lands of the Dena'ina People

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Terry Snyder](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 10:06:53 PM

I support the Anchorage Assemblies request for a two year pause and request for more information on the Eklutna Dam project.

B-5. Support Dam Removal

This page intentionally left blank.

From: [Ed Cazch](#)
To: [Sam Owen](#)
Subject: Eklutna River Restoration
Date: Tuesday, January 9, 2024 5:39:41 PM

Please restore flow to the entire Eklutna River so that all 5 Species of Salmon can return and thrive in its waters. No more diminished flows or degraded salmon habitat. Turn this stream into a world class fishing destination and we will all prosper off of the money it will bring in.

Edward Czech
Anchorage, Ak
907-599-0025
Sent from my iPhone

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Brad Meiklejohn](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 10, 2024 1:41:48 PM

CAUTION: This email was received from an external source

THE POWER COMPANIES WANT YOU TO BELIEVE THAT WE MUST SACRIFICE SALMON TO SAVE THE PLANET. THAT IS A FALSE CHOICE.

IT IS POSSIBLE TO HAVE HYDROPOWER THAT DOES NOT KILL SALMON. THAT MEANS GIVING THEM ENOUGH WATER AND ALLOWING THEM TO REACH THEIR SPAWNING GROUNDS. THE PLAN PROPOSED BY THE POWER COMPANIES AT EKLUTNA FAILS ON BOTH COUNTS. THE POWER COMPANIES PROPOSE TO DELIVER A TRICKLE OF WATER VIA A SPIGOT THAT CREATES A DEAD-END RIVER, LEAVES A DRY RIVERBED FOR ONE MILE, AND REQUIRES SALMON TO WALK TO THEIR SPAWNING GROUNDS IN EKLUTNA LAKE. THE POWER COMPANIES' PLAN ALSO WOULD JEOPARDIZE THE ANCHORAGE DRINKING WATER SYSTEM.

THE ORIGINAL IMPACT, 93 YEARS AGO, WAS THE LOSS OF A SOCKEYE SALMON RUN TO EKLUTNA LAKE. THE RETURN OF THAT SOCKEYE RUN WOULD BE A BOON TO SOUTHCENTRAL ALASKA. BUT IF WE LET THE POWER COMPANIES HAVE THEIR WAY NOW WE WON'T GET ANOTHER CHANCE FOR 35 MORE YEARS.

THE POWER COMPANIES ARE PEDDLING FEAR OF CLIMATE CHAOS, DWINDLING GAS SUPPLIES AND RISING ELECTRIC RATES. ALASKANS ARE SMART ENOUGH TO SEE THROUGH THIS SMOKESCREEN.

RATHER THAN RUSH TO SPEND \$60 MILLION NOW TO BUILD A FLAWED AND RISKY GUTTER THAT KILLS SALMON, WE PROPOSE WAITING TO DO THE JOB RIGHT ONCE RENEWABLE ENERGY SOURCES COME ON-LINE TO REPLACE EKLUTNA HYDRO. THEIR PLAN WOULD REDUCE EKLUTNA HYDROPOWER NOW, RAISE YOUR RATES NOW AND FAIL TO HELP SALMON. OUR PLAN WOULD HAVE NO IMPACT ON RENEWABLE ENERGY, HAVE NO IMPACT ON RATEPAYERS, AND WOULD RESTORE THE EKLUTNA RIVER AND ITS SALMON.

SALMON ARE THE ULTIMATE RENEWABLE RESOURCE IN ALASKA. IF WE GET OUT OF THEIR WAY, THEY KEEP COMING BACK TO US.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Katherine Spangler](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 10, 2024 11:28:09 AM

CAUTION: This email was received from an external source

I support the removal of the eklutna dam

From: [barbara reilly](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 12, 2024 2:27:50 PM

CAUTION: This email was received from an external source

Remove the Eklutna dam please. Help restore salMon in Alaska. the Eklutna DAM BLOCKS SALMON PASSAGE TO THEIR SPAWNING GROUNDS. tHE CHEAP SOLUTION CHOSEN BY cHUGACH eLECTRIC aSSOC. (cea), mATANUSKA ea, AND THE mUNICIPALITY OF aNCHORAGE LEAVES ABOUT A MILE OF THE RIVERBED DRY. tHIS IS NOT ACCEPTABLE. pLEASE TAKE DOWN THE DAM OR PRESENT AN ALTERNATIVE TO THE DAM THAT ALLOWS SLMON TO SPAWN.

From: [Elaine Reale](#)
To: [Sam Owen](#)
Subject: Comment on Eklutna Hydroproject
Date: Friday, January 12, 2024 2:21:02 PM

As solicited, here are my comments about the Eklutna hydroproject.

Remove the Eklutna dam and return salmon to the Eklutna River. This is a critical opportunity to bring salmon back and protect the resource into the future. Salmon need access to Eklutna Lake and its upper tributaries.

One can't put a price on the salmon resource. Any issues with increasing rates for energy in the future can be dealt with via renewable resources and technology. Humans are intelligent and can figure this out. The salmon should be the priority.

Elaine Reale
40 year resident of Anchorage

From: [Nancy Deschu](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Comment
Date: Saturday, January 13, 2024 6:02:09 PM

I am in favor of removing the dam.

It has been a long time since salmon made their way up the Eklutna.

In the long run, removing the dam is the right thing to do for the Eklutna people, for public/park users, and for the fish.

It may be a much more costly alternative now, but it will not get less expensive in the future. And these salmon are a natural resource in the public trust that will continue to migrate up the Eklutna and spawn long into the future if the dam is removed.

Nancy Deschu
Anchorage, Alaska

From: [Brenda Hewitt](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 15, 2024 8:29:30 AM

CAUTION: This email was received from an external source

I support the community alternative. I don't understand why the utilities want to spend \$57 million on infrastructure that won't even fix the fish situation halted nearly a century ago. Take the dam down. Provide clean drinking water to Anchorage without harming the water utility.

I would have supported a revised dam with a fish ladder but the utilities didn't put that forward as an option. I hope Governor Dunleavy can fix that or take the dam out.

From: [Curtis McQueen](#)
To: [Sam Owen](#)
Subject: Eklutna River
Date: Monday, January 15, 2024 2:43:44 PM

I support the community alternative.
Curtis J. McQueen.

Sent from my iPhone Curtis J. McQueen

From: [Kenn Moon](#)
To: [Sam Owen](#)
Subject: Restore the Eklutna River
Date: Monday, January 15, 2024 10:19:24 PM

My name is Kenn Moon. I first came to Alaska as a pilot with the Air Force in the 1950's, homesteaded in the 1960's and have seen many ecological changes since. Almost all them bad. The opportunity we have now to open up and restore the Eklutna River and lake to its natural state seems almost miraculous to me. We as humans don't often have a chance to correct the errors of the past. We do now and should seize it! Do the right thing. Take down the dam at the lake, Open up the full flow of water to the Eklutna River. Bring back the fish !

Sent from my iPhone

From: [Kim Zello](#)
To: [Sam Owen](#)
Subject: Eklutna Community Alternative
Date: Tuesday, January 16, 2024 9:41:12 AM

I support the Community Alternative. Thank you

Sent from my iPhone

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

Restore the river completely -
Remove the Dam!

Jamea Isham

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: mstundra@gmail.com
To: [Sam Owen](#)
Subject: ratepayer residing on Dena'ina Land
Date: Tuesday, January 16, 2024 6:25:23 PM

I would like to show my support for Eklutna Village Tribe via of the Municipality of Anchorage's formal policy on restoring the Eklutna River. I endorse the Community Alternative because it best provides options on allowing salmon, particularly sockeye, back to Eklutna Lake and the Eklutna River. The MOA's policy aims to protect ratepayers, taxpayers, our drinking water, salmon, and the Eklutna Dena'ina.

Quyana, thank you!

Michelle Sparck

3225 Tayshee Circle

Anchorage, AK 99504

From: [Lee Nathan](#)
To: [Sam Owen](#)
Subject: Eklutna Restoration Proposal
Date: Tuesday, January 16, 2024 6:56:35 PM

Dear Sirs;

The Community Alternative is the obvious solution for the future wellbeing of all. Implementing any of the other methods would be unnecessarily wasteful and foolhardy. It's unfathomable that any other proposal would even be considered.

Sincerely,

Robert Nathan
Leslie Nathan
William Nathan
Jeremiah Nathan

3211 Shamrock St
Anchorage, AK 99504

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

Thank you for the public meetings on the Eklutna River project.

I feel that the main issue should be a full removal of the dam.

A full restore of habitat for fish & wildlife to the period prior to 1927.

New technologies will be available for sustainable energy presently and in the future.

Alaska's pristine lands are our future!

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Rachel Christensen
MEA Ratepayer
Email: r.anne.christensen@gmail.com

Write your comments on the Draft Fish and Wildlife Program here:

I would first like to say that I am very dissatisfied with the format of this meeting. I would much prefer to hear people's comments in an open and transparent way. Every decision we make reflects our values, and I value safe, affordable energy, but above that I value fish, my relationship to the land, and the ability to sustain our communities with the resources we have. I support the removal of the dam when the energy is available to be replaced with other renewable alternatives.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [Shirley Craig](#)
To: [Sam Owen](#)
Subject: Public comments
Date: Tuesday, January 16, 2024 12:06:44 PM

Dear Public:

I am voicing my opinion for my Village of Native Village of Eklutna. We the Idlughet Eklutna want to see that Damn Dam come down!! So the natural flow of the water is flowing from Idlu Bena the Eklutna Lake to the Tikahtnu Knik River as it once did to have a healthy habitat of the 5 species of the salmon return to the river.

The only electric company not working with us to make this happen is Chugach Electric Co. They want see the \$\$\$ in their pockets and don't give a care of what everyone else needs or reasons are. Your electric bill will go up. As working with them they do not keep their word. Help us take a stand. Chi'nan Thank You.

Shirley J. Craig
Vice President
Native Village of Eklutna

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Tom Harris/Knikatnu, Inc.

atomharris@gmail.com

Write your comments on the Draft Fish and Wildlife Program here:

I support the Native Village of Eklutna's Community Alternative Plan. The Restoration of the Eklutna River is more than a litmus test for the project owners, it is a socio-economics moral imperative for the entire Alaskan community.

If this small river cannot be fully restored what hope do we have of restoring the largest loss of wildlife resource in this nations history. Alaska was documented as the least productive wildlife harvest state in the nation in 2004. Since then it is now known that 90% of the moose harvest is gone in the lifetime of this hydro project. It's gone because bears lost their salmon and turned to moose calves.

If this lesson of restoring salmon cannot be learned within walking distance of the states largest city then the whole is lost. The policies responsible for the loss of salmon on the Eklutna River are also the policies responsible for the loss of salmon statewide.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: bendnorman@everyactioncustom.com on behalf of [Bennett Norman](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Wednesday, January 17, 2024 3:42:56 PM

Dear Owners of The Eklutna Hydroelectric Project,

Hello,

Chugach Electric, Matanuska Electric, and the Municipality of Anchorage need to adopt the vision for the Eklutna River endorsed by the Village of Eklutna and Eklutna Inc. The vision demands a level of restoration that allows for the habitat of all five species of Pacific salmon. Chugach's preferred alternative will leave a segment of the Eklutna River dry. This will inhibit the return of sockeye salmon as they require lake habitat to spawn. This proposed plan is not in line with the Village of Eklutna and Eklutna Inc.'s vision for the river or the 1991 Fish and Wildlife Agreement, which mandates that the utilities must mitigate their impacts on sockeye salmon and their spawning grounds.

We have an opportunity to completely restore the Eklutna River and a food source for the Eklutna people. I'm very supportive of cheap and renewable energy, but keeping the damn intact is not worth the social and cultural cost. Across the country, utilities, localities and states are recognizing the harm of forced damming of cultural significance waterways and are starting to completely remove dams. The Klamath River damn removal started just the other week and it was announced 4 dams on the Lower Snake River will be removed. This is the moment to write an enormous historical wrong. Please don't fall short. Restore the entire Eklutna River.

Sincerely,
Bennett Norman
425 W 16th Ave Anchorage, AK 99501-5013
bendnorman@gmail.com

Audio Recording Transcription of Chantal de Alcuaz

January 17, 2024, 2:00-4:00pm, Arctic Center, Anchorage AK

"My name is Chantal de Alcuaz and I live here in Anchorage, Alaska. I'm a CEA Chugach Electric Association ratepayer. Before I talk about the proposal, I just want to start by saying that I think the structure of these meetings is very disappointing. We started with the presentation by a contractor who works for the owners group without any opportunity for other perspectives or rebuttal, even from the Native Village. And now the public is separated for their submission of testimony, so that they can't hear what each other is saying. And I fear that the format was deliberately designed to obscure the growing consensus that the restoration plan presented today is, at best insufficient and at worst unjust. So, to get to the matter at hand outside of the meeting format, I'd like to express my disappointment about the "AWWU Portal Option" and conversely, my passionate support for the community alternative of specifically complete dam removal once other sources of renewable energy have been secured. For years now, my own utility, Chugach Electric Association, has been disappointingly reluctant to add renewable energy to the grid. Now it is using the loss of a relatively small amount of renewable power, approximately 3% of its total production, I'm told, and subsequent rate hikes as its rationale for this inadequate plan. I believe that pitting salmon against renewable energy is a false choice that we don't have to make, and I believe that no amount of money saved, or costs avoided can justify perpetuating the shameful legacy of colonization. Unlike the AWWU Portal Plan, the community alternative would create a continuous flow of water from the lake to the ocean for the restoration of all five species of salmon, as well as for the fish to return to the miles and miles of tributaries above the lake. We have a very generous commitment from the nonprofit groups to remove the dam, so that the ratepayers and taxpayers will not have to bear the cost of dam removal. And most importantly, we have a historic opportunity to restore salmon and to right a wrong that the Eklutna people have now borne for generations. I sincerely hope that the powers that be come to their senses so that we won't squander the opportunity. Thanks for the time."

From: [Meghan Barker](#)
To: [Sam Owen](#)
Subject: Eklutna comment
Date: Wednesday, January 17, 2024 9:41:47 PM

Dear operators,

I strongly oppose the draft Fish and Wildlife plan that was proposed for the Eklutna River that leaves a mile of the river dry, fails to provide fish passage to critical habitat, and is contrary to the wishes of the Indigenous People of Eklutna.

As a recreational angler, I know the importance of intact habitat and healthy streams. As the region continues to grow in population size, a thriving and fish-filled Eklutna River can help meet the needs of increased use of our local fisheries. On top of fishing, I visit the Eklutna area as a runner, skier and paddler; I often bring visitors to Eklutna to show them an iconic Southcentral Alaska location. I want to be able to speak to the health of the fishery when I bring them here instead of showing a dried out river.

Additionally, the Native Village of Eklutna has clearly communicated its vision for thriving wild salmon in the Eklutna River and adjacent waters. We have a responsibility to honor the wishes of the original stewards of this land, who have kept Eklutna the incredible place that it has been for generations.

Please remove the Eklutna Dam, fully reconnect the river, and return the water flows needed to support the fishery.

Sincerely,
Meghan Barker
Anchorage (99516)

From: [Michael Bronson](#)
To: [Sam Owen](#)
Subject: Take down the dam
Date: Wednesday, January 17, 2024 8:54:14 PM

Sent from my iPhone

From: [Molly Larmie](#)
To: [Sam Owen](#)
Subject: Community Alternative Endorsement
Date: Wednesday, January 17, 2024 6:45:21 AM

As someone who has lived in Anchorage for many years, and who values tribal sovereignty, outdoor recreation, and healthy ecosystems, I endorse the Community Alternative. It will protect ratepayers, taxpayers, our drinking water, salmon, and the Eklutna Dena'ina.

Thank you for listening.

Sincerely,
Molly Larmie

From: [Susan negus](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 18, 2024 9:49:00 AM

CAUTION: This email was received from an external source

I went to your presentation on 1/17/24 @ Artic Rec center. As I can see you have shown no Good will toward your customers. It was CLEARLY a one sided presentation. Plenty of money has been spent on the “owners” side when it could have been doing something useful. You didn’ t have to pay for the removal of the lower dam. Now all you have to do is remove the rest of the dam. With the help of other groups to help fund it. You are afraid to give up your control. There is no SHORTAGE of water in Alaska. Your evaluation to send a trickle of water down the river will not restore the salmon to the lake.

Please remove the dam coming from the lake and make the Ekluna a free flowing river. Thank you

From: [Susan Sherman](#)
To: [Sam Owen](#)
Subject: Eklutna Dam public comment
Date: Wednesday, January 17, 2024 9:00:44 AM

I'm an Anchorage resident and I support the "Community Alternative" to remove Eklutna Dam and restore the river. I understand this will lead to a small increase in my property taxes and I am willing to pay that price. I also support increasing renewable energy sources and diversifying the energy stream in Alaska.

Susan Sherman

From: [Amy Robinson](#)
To: [Sam Owen](#)
Subject: Support community option
Date: Thursday, January 18, 2024 10:28:30 AM

Please do the right thing and support the community option, not the AWWU portal option. We need viable healthy salmon habitat.

The new sources of renewable energy it will take are worth developing. Whatever they may be.

Thank you.

Amy Robinson
14440 Canyon Rd
Anchorage

From: [John W Schoen](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 18, 2024 2:23:05 PM

CAUTION: This email was received from an external source

J Schoen comments on the draft fish and wildlife plan for the eklutna Dam

I have lived in Alaska for 47 years and have been an Anchorage resident for over 30 years. I am a wildlife ecologist and have spent much of my professional career working on wildlife conservation issues throughout the state. I do not believe that the proposed Eklutna plan adequately address the ecological requirements of salmon, the vision and needs of the Eklutna people, or the legal responsibilities to mitigate the Eklutna project's ecological impacts to fish and wildlife resources in the Eklutna Watershed.

The Eklutna River must be re-connected to Eklutna Lake to ensure fish passage and restoration of the river's coho, chinook, and sockeye salmon. The proposed plan will leave one mile of the river dry and only release 3% of historic water flows. This will not allow fish passage into the lake and its upstream habitat. Salmon populations will not recover without a reliable and consistent supply of water and access to important up-stream spawning and rearing areas. I do not believe that the Chugach Electric Association, Matanuska Electric Association, or Municipality of Anchorage can meet their mitigation obligations within their budget constraints with anything less than removal of the dam. Therefore, I strongly recommend that the Eklutna Dam be removed to restore water flows required to support the Eklutna fisheries.

I recognize and appreciate the region's current reliance on the Eklutna hydroelectric energy source. However, it seems reasonable to remove the Eklutna dam within the next decade, when replacement renewable energy is expected to be available. I also understand that community partners are willing to assist in offsetting the costs of dam removal. Thus, this cost-sharing opportunity will be a fiscally responsible decision. Electric ratepayers and many Anchorage citizens support this vision that is also shared by the Eklutna people who have depended upon this salmon fishery for millennia.

In conclusion, I strongly recommend that the Eklutna Dam be removed to restore water flows required to support and sustain the Eklutna ecosystem and its important fisheries for the benefit of current and future generations.

Thank you for considering my comments.

Sincerely,

John W. Schoen, Ph.D.
Wildlife Ecologist, retired
13240 Mountain Place
Anchorage, AK 99516

From: rfbutera@icloud.com
To: [Sam Owen](#)
Cc: [Zaletel Meg](#); Christopher.Constant@anchorageak.gov; wwmas@anchorageak.gov
Subject: Eklutna Draft Fish and Wildlife Program Comment
Date: Thursday, January 18, 2024 1:08:21 PM

After reading and listening to the proposed solutions for Eklutna Lake it appears that we are missing an obvious solution.

As it is now, there are two sides in this debate. The side that wants to open up the entire Eklutna drainage to salmon, and the side that wants to keep the existing hydro project operational.

Except for its effect on salmon migration, the Eklutna Hydroelectric project is a gem. Producing enough greenhouse gas free renewable energy to power 25,000 homes. Of equal importance, the lake reservoir stores electrical power, it is essentially a massive battery, that can be used to quickly meet daily power demand fluctuations. This is exactly what is needed to integrate other renewables such as wind and solar energy into our electrical grid.

Restoring salmon to the Eklutna River is a laudable goal, but at a time when we are facing an existential climate crisis, we must do all we can to reduce use of fossil fuel. The Eklutna Hydroelectric Project has a critical role to play in our low carbon future and should not be removed until we have turned around our climate.

Apparently, there is a 1991 document that says something must be done. So, an alternative is proposed to spend \$57M to put in a valve to release some flow into the river. This alternative satisfies no one. It does not significantly restore salmon, it stresses our critical water supply infrastructure, and it is a waste of ratepayer money.

The obvious solution is to rewrite the agreement. Do nothing now. Put a subsidy on each kilowatt hour of Eklutna generated power that will go into a dedicated fund to remove the project in the future. And designate this time in the future to be when there is either a surplus of renewable energy or the project reaches its usable life. The \$57M would be much better spent as the seed money for this fund.

An agreement is only as binding as the parties involved agree to. Let's go back to the table and come up with a solution that works for all. Things are different now than when that original document was written. Climate change was an unknown. We need to acknowledge this. The salmon will wait.

From: [Valanne Glooschenko](#)
To: [Sam Owen](#)
Subject: Comment re: the Draft Fish and Wildlife Plan
Date: Thursday, January 18, 2024 2:34:31 PM

[Please note that I support restoration of the Eklutna River and the historic salmon runs, as currently proposed by the Native Village of Eklutna and partner organizations.](#)

[The Native Village of Eklutna plan proposes a reasonable time line of a decade when replacement renewable sources of energy are expected to be available. In addition, two nonprofit community partners have agreed to source funds for the dam removal.](#)

[I reject the draft Fish and Wildlife Plan now up for public review by supporters of the Eklutna Hydroelectric Project.](#)

[That draft plan would only restore 3% of water back to the river. And in addition prevent salmon from accessing critical habitat in and around Eklutna Lake and its upstream tributaries.](#)

[Sincerely,](#)

[Valanne Glooschenko, M.Sc.,
6017 Doncaster Dr.,
Anchorage, AK 99504](#)

From: [Dan Thompson](#)
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Plan public comment
Date: Friday, January 19, 2024 7:39:41 AM

As a permanent multi-decade resident and Eklutna Valley homeowner, I support the full restoration of the Eklutna River and its former salmon run. Anchorage energy producers have a legal and moral responsibility to return the salmon they destroyed in 1928.

For nearly 100 years local energy producers have enjoyed unfettered financial benefits from Eklutna River and Eklutna Lake without regard to the financial and cultural loss to this historical fishery. It is long past due for the State of Alaska to help restore this watershed, and take full responsibility for the destruction of this significant public resource.

Sincerely,
Daniel Thompson
21921 Tena Street
Chugiak, Alaska 99567

Sent from my iPhone

From: [Lindholm JT](#)
To: [Sam Owen](#)
Subject: Eklutna Dam.
Date: Friday, January 19, 2024 8:19:34 AM

I ask you to remove the Eklutna Dam to fully reconnect the river and return the water flows needed to support the river's fisheries.

Thank you for your time with this and in making the right choice.

Best,

J.T.

John T Lindholm
2205 Hiland Road
Eagle River, AK 99577

From: [Rick Sinnott](#)
To: [Sam Owen](#)
Subject: Full restoration of Eklutna Lake and River
Date: Friday, January 19, 2024 2:39:43 PM

Comments on the Draft Fish and Wildlife Program's preferred alternative

The electrical producers and Municipality of Anchorage signed a contract in 1991 wherein they agreed to restore fish populations and other ecosystem functions and values lost when two dams were built on the Eklutna River in 1928.

The draft program contains some good field research but it missed at least one major issue. Eklutna Lake is a glacial lake with very cold water. In a lake, the warmest water tends to rise to the surface and the coldest tends to sink to the bottom. In a natural system, it is the warmest water that flows out of the lake and into the river. But if the preferred alternative is chosen, the AWWU pipeline will be the source of the river's water. The intake structure is on the lake's bottom. The colder water flowing into the river from the AWWU pipe will limit production of some aquatic invertebrate populations (fish food), retard fish growth rates, and affect survival of eggs and fry by freezing sooner than water that would have flowed out of the lake naturally. The final fish and wildlife program should consider the potential impacts of using the "wrong" water to provide optimal downstream fish habitat.

Conversely, removing the colder water from the lake would delay when the lake freezes (it typically freezes in mid-December but has frozen over as late as early January). It might also affect ice thickness. These could have local environmental impacts but are more likely to be relevant to winter recreational activities.

Much more concerning is the program's own finding that the preferred alternative will restore only about one-third of the watershed's potential fish habitat, and the amount of water released through the AWWU pipeline will represent only 4% of the river's historical summertime flow. A fast and simple multiplication of these two figures suggests that the preferred alternative only intends to restore about 1% of the watershed's historic fish-related functions and values. This clearly does not satisfy the requirements of the 1991 agreement.

Notably, none of the municipal, state, and federal agencies that participated in the field research and planning effort support the preferred alternative, except Alaska State Parks, which is certainly no expert on fish and wildlife habitat and productivity. The Native Village of Eklutna, the entity most affected by the loss of most of the river's salmon, does not support the preferred alternative. Instead they have proposed a "community alternative," one that wasn't considered in the draft plan.

I support the "community alternative," which will remove the dam in the near future, when the small amount of electricity that the hydroelectric facility's turbines produce is replaced by other alternative energy sources.

From: [stephen Parker](#)
To: [Sam Owen](#)
Subject: Eklutna River
Date: Saturday, January 20, 2024 5:03:17 PM

I am writing to support the removal of the Eklutna River dam.

The Eklutna River Hydro has a legal obligation to restore adequate river flows to support and reestablish wild salmon in the river and to the Eklutna Lake.

The restoration of the river must include connecting Cook Inlet to the Lake with adequate flows to allow for passage of wild salmon. Any alternative is inadequate, in violation of the agreement of sale of The Eklutna Hydroelectric Project and a waste of tax and ratepayers' money.

Thank you,
Stephen J. Parker
Eagle River, Alaska

From: [Claire kaufman](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 21, 2024 11:30:41 PM

CAUTION: This email was received from an external source

As a taxpayer in the anchorage municipality, i support the complete removal of the Eklutna River Dam and restoration of the entire Eklutna River. We have an obligation To restore this salmon bearing river. this obligation goes beyond minimum requirements to mitigate the environmental Impacts of the dam. It is our obligation to create and enhance the RESILIENCE of our ecosystem, to support future generations and to support the native village of eklutna and the dena'ina people, the ORIGINAL stewards of the land we call home.

From: [dennis A Moore](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 12:46:52 PM

CAUTION: This email was received from an external source

I am in favor of removing the hydro operation in favor of letting the stream return to a natural free flowing river.

From: [Loren West](#)
To: [Sam Owen](#)
Subject: Remove the dam, restore the river and save the salmon
Date: Monday, January 22, 2024 10:48:18 PM

Loren West
6420 E 16th Ave, Unit B
Anchorage, AK 99504

From: [Mike Bronson](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 7:43:51 PM

CAUTION: This email was received from an external source

Take down the dam. Give us sockeyes.

i've been a chugach rate payer for a million years and will be a long time. Was an MEA rate payer before that, and our family still helps pay for MEA power on hollywood road.

remove the dam. get sockeyes back; they're more important.

From: [Paula Davis](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 1:11:17 PM

CAUTION: This email was received from an external source

i spend time at Eklutna lake on skis, kayak and bike, and have always been sad to tell my fishing grandchildren about the lack of fish. I am fully in favor of removing the dam and re-establishing salmon, especially since the Eklutna tribe is so in favor of it too.

Eklutna Draft Fish and Wildlife Program Comment Form

RECEIVED BY
JAN 26 2023
EXECUTIVE OFFICE

Name, Agency/Organization (optional): Email: smfreeman@chickaloon-nsn.gov
Stephanne Freeman

Chickaloon Village Traditional Council

Write your comments on the Draft Fish and Wildlife Program here:

I am in support of either removing the dam entirely after replacement renewable energy has been secured or of replacing the dam with one that could be at a lower elevation and closer to the minimum amount of water left in the lake when drawn out by AWWUS the hydroproject. Either of these options would completely reconnect the entire watershed again, allowing salmon to travel through the watershed freely, as they should. I love that restoring 12 miles of fish habitat is important to the Eklutna hydro stakeholders, but it's really only 11 out of 30+ miles of fish habitat restored. I believe that salmon would utilize the watershed in its entirety. Thanks!

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [C.Smith](#)
To: [Sam Owen](#)
Subject: Eklutna Lake Dam
Date: Tuesday, January 23, 2024 5:06:38 PM

As a 73-year-old white woman who has lived a life of 'white' privilege, I wholeheartedly urge you to remove the Eklutna Lake Dam. By doing so, you will be helping to re-establish a slowly vanishing culture in a small native village. Haven't the native peoples of North America suffered enough at the hands of 'white' people over the past centuries?

Give them the respect they deserve and their culture back. Help them to re-establish the salmon run and therefore bring back the cultural side of people gathering to harvest nature. Listen to their desires and needs - they were here long before man moved in to try to 'civilize' them. Help them to keep their culture strong by removing the dam.

I am 2nd generation American, a descendant of Lebanese people who moved here at the turn of the 20th century. My biggest regret is that I was not immersed in my culture to the degree that I was able to pass more of it along to my children and grandchildren.

Cheap renewable energy for 25,000 Anchorage and Matanuska-Susitna Borough homes for decades? They will survive despite the increased cost. I'd hate to tell you what I pay GVEA for their power.

The natives were here long before the 'white' man. Give them their culture back.

Respect and support native pride!

Sincerely,
Candace Smith
Salcha, Alaska

From: isabellesaam4@everyactioncustom.com on behalf of [Isabelle Saam](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River!!!
Date: Tuesday, January 23, 2024 10:10:04 PM

Dear Operators of the Eklutna Hydroelectric Project,

As a tribal member of the Native Village of Eklutna, I can not stress how important fish are to our community and people. It is one of the most important traditional subsistence foods in our area. I grew up catching fish and setting fish nets in Eklutna. Those are my favorite memories. Learning how to cut fish, learning what the different parts are, how to set the net, how to bait the hook, how to tie fishing knots. All with my family. My siblings, parents, cousins, aunties, uncles, grandparents and great grandparents. When I have kids and grand kids, I want them to be able to fish those waters. Just how I did as a kid, and the rest of my family and elders. The fish are so important to our peoples health. Please remove the Eklutna dam. I stand strong with my family and ancestors. This means so much to our people. Restoring the fish back to their waters, that is their home!!

Chin'an.

Sincerely,
Isabelle Saam
Wasilla, AK 99623-0974
isabellesaam4@gmail.com

From: [Funke, Michael \(HP Technology Consulting\)](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Tuesday, January 23, 2024 4:17:04 AM

Please remove the Eklutna Dam to allow the restoration of salmon in the river.

Thank you.

Michael Funke
2925 W Bayridge Cir
Wasilla, AK 99654
480-334-4697

From: [Romie Deschamps IV](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 23, 2024 10:40:59 AM

CAUTION: This email was received from an external source

Nothing but positives incur not only for the enviRomment but the fish and wildlife happen when dams built for the few are destroyed and the river and lake is returned to the original state... plus new commercial opportunities are created that were not available until this occurs..!

From: [Whitney Waskey](#)
To: [Sam Owen](#)
Date: Tuesday, January 23, 2024 2:48:17 PM

Have you ever heard of people saying leave it better than you found it?
Just like camping you bring the shit in, you pack the shit back out and leave it better than
when you showed up!
Removed the dam!
And bring it back to its natural habitat!

Whitney L Waskey

From: [Tica Drury](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 24, 2024 3:42:19 PM

The Eklutna hydroelectric project is a false solution to green energy. If a project destroys an entire river, including an integral part of the ecosystem - its salmon runs - it cannot be considered "green." Of all of the potential alternatives offered by technical working group partners, the project owners chose the one that was the worst for the ECOSYSTEM BUT had the cheapest price tag. This violates the 1991 Purchase Agreement, which requires them to protect and enhance fish and wildlife habitat. The mitigation plan directed by said Purchase Agreement is in place so history doesn't repeat itself. The project owners need to come up with a new plan that respects the environment and the wishes of Native Village of Eklutna, who have been living on this land for generations and have been excluded from the decision-making process. Instead of wasting Alaskans dollars on a plan that won't fully revive the river and its salmon runs, I ask you to remove the Eklutna Dam (at no cost to the project owners might I add) and fully reconnect the river to bring back a thriving Anchorage area fishery. Thank YOU.

From: [adrienne hall](#)
To: [Sam Owen](#)
Subject: Comment
Date: Wednesday, January 24, 2024 5:57:36 PM

To Whom It May Concern,

I am very concerned about the MEA and CEA plan and how little water it would leave in the Eklutna River. Their project has caused significant damage to the river system, and they should take more responsibility for restoring in-stream flow and ensuring salmon can return to Eklutna Lake. The current plan does none of those things. The only responsible course of action would be to honor the past and enduring connection the Indigenous people have to this place by removing the Eklutna Lake dam, fully reconnecting the river, and returning the water flows needed to support the river and its fisheries.

Thank you,
Adrienne Lindholm
Eagle River, Alaska

From: [Debi Poore](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Removal
Date: Wednesday, January 24, 2024 10:32:15 AM

To those working on this project,

In Acknowledgment of Land Ancestors,

I was born to Denai'na Chickaloon territory; raised on Denai'na Kenaitze land at Eagle Rock on the Kenai River; and for more than forty years have made my home near Kachemak Bay and Homer, on traditional lands of Denai'na Athapaskan and Alutiiq Sugpiak people. I recognize responsibility to respect and care for this Indigenous land and inhabitants.

My parents moved to Alaska from Minnesota.

I am in full support of complete removal of the hydro electric dam. It is time to restore the Eklutna River to its full environmental habitat potential. This is the right thing to do. And it is overdue.

Sincerely grateful for this opportunity to offer comment.

Deborah Poore

Homer, Alaska

From: [Jaye Salter](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Project
Date: Wednesday, January 24, 2024 10:57:08 AM

I fully support the REMOVAL of the Dam on the Eklutna river, The priority should be the First Peoples and rightful guardians of this watershed.

the 56million proposed to do a work around could be better spent finding a different alternative for providing energy to the 25k people that would be impacted by this removal.

Jaye Salter

I live, work and recreate on the land of the Ahtna and Dena'ina People.

From: [Kristian Erickson](#)
To: [Sam Owen](#)
Subject: Freeing the Eklutna River
Date: Thursday, January 25, 2024 12:46:52 PM

There is no other reasonable option than to remove the Eklutna Dam entirely. There will be some temporary pain for electric utility ratepayers, but correcting a grave ecological error is worth the cost.

As with all obstacles to free-flowing rivers, here the river will eventually win. Instead of waiting centuries for natural forces to undo the damage of the dam, let's do it now so that our children can enjoy what Alaska Natives did 100 years ago.

Kristian Erickson, Anchorage

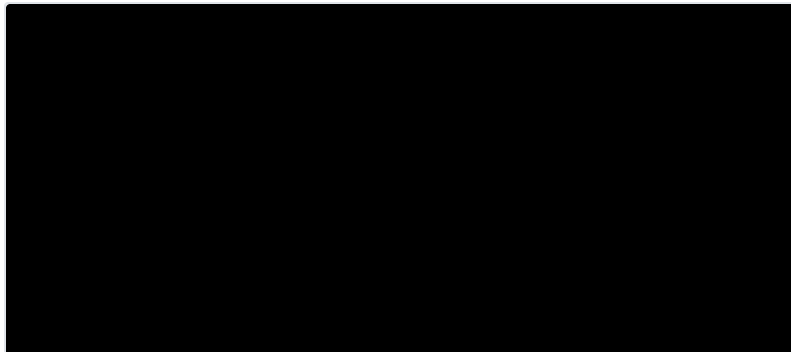
Gesendet von [Outlook für Android](#)

From: [Anna Bosin](#)
To: [Sam Owen](#)
Cc: [Rep. Zack Fields](#); [Sen. Löki Tobin](#); [Christopher Constant](#)
Subject: I support Restoring Eklutna River
Date: Friday, January 26, 2024 1:05:02 AM

I support restoring the entire Eklutna River, as the Native Village of Eklutna is entitled to from over 90 years of land taken from them and no direct benefit or fulfillment of an agreement between the entities in power and their Tribal government.

Other renewable energy sources are quickly entering the market for clean electricity. The time is now to advance the technology for the good, while correcting a past wrong.

I am reading a fascinating book [How Infrastructure Works by Deb Chachra: 9780593086599 | PenguinRandomHouse.com: Books](#)



**How Infrastructure Works by Deb Chachra:
9780593086599 | PenguinRandomHo...**

NAMED A BEST BOOK OF 2023 BY PUBLISHERS WEEKLY "Revelatory, superbly written, and pulsing with wisdom and human..."

And the author suggests renewable energy sources work well in smaller, dispersed networks rather than a centralized mega station. There is also a safety benefit by having more redundancy in the system to mitigate major failures and weather disruptions from climate change.

I am glad this topic is coming to the public and that the Village of Eklutna is at the table this time. thank you

Anna Bosin
Anchorage Resident

From: christyeverett.personal@everyactioncustom.com on behalf of [Christine Everett](#)
To: [Sam Owen](#)
Subject: The Eklutna River Draft Fish and Wildlife Program is inadequate!
Date: Friday, January 26, 2024 4:13:35 PM

Dear Owners of The Eklutna Hydroelectric Project,

This comment is in regard to the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River. The Native Village of Eklutna's vision for river restoration should be supported. Removal of the Eklutna Lake Dam is necessary to fully reconnect the river and return the water flows needed to support the river's fisheries. I urge you to consider removing this dam within the next decade, once replacement renewable energy is available.

The current proposal does not provide fish passage into the lake and upstream habitat. The river's historic salmon runs will never return under this plan. Approximately a mile of the river will remain dry and very little of the historic flow will be restored. You have a legal duty to mitigate the harm of this project. This proposal does not achieve that.

Please consider removing the Eklutna Dam so that all five species of salmon can once again return to the river.

Sincerely,
Christine Everett
2308 Robinson Cir North Pole, AK 99705-6269
christyeverett.personal@gmail.com

From: [Joe Lawton](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Friday, January 26, 2024 10:13:07 AM

I favor removal of the dam to restore salmon habitat. MEA should do more to encourage renewables as part of long-range strategy. Don't be stupid, but better embrace the inevitable.

Sent from my iPhone

From: [Margaret Anderson](#)
To: [Sam Owen](#)
Subject: Connect the fish
Date: Friday, January 26, 2024 7:05:41 PM

Please restore the flow of plenty of water along the whole way between the sea and Eklutna Lake for the sake of the salmon. Restore the salmon spawning habitat all the way from sea to river to lake to glacier, as was promised!

From: paultapu@everyactioncustom.com on behalf of [Paul Twardock](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Friday, January 26, 2024 4:03:24 PM

Dear Owners of The Eklutna Hydroelectric Project,

I support the full restoration of the Eklutna River that includes the removal of the dam, as supported by the Eklutna Village. The alternative apparently addresses financial concerns and long term energy supply. It seems a win win for all parties, and supports the long term promises made when the ownership of the dam was transferred to ML+P. Opportunities like this come along infrequently and I urge the decision makers to envision river and ecosystem fully restored to its historical roots.,

Sincerely,

Paul Twardock

Sincerely,
Paul Twardock
1322 N St Anchorage, AK 99501-4273
paultapu@gci.net

From: [Ray bulson](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 26, 2024 1:02:45 PM

i am in support of restoring the eklutna river completely so that salmon can return to its entire length.

From: robtyntforbes@everyactioncustom.com on behalf of [Robyn Forbes](#)
To: [Sam Owen](#)
Subject: One Alaskans Eklutna River Draft Fish and Wildlife Program
Date: Friday, January 26, 2024 11:05:22 AM

Dear Owners of The Eklutna Hydroelectric Project,

I have been an Alaskan since 1986 and have had the privilege of enjoying our outdoor resources in a way that is impossible in many other parts of the world. I have always been saddened by the Pacific NW and how much beauty and natural life the rivers that used to flow freely provided before we modified their purpose.

It is time to make it right.

The Eklutna river should flow freely and be returned to its natural state, with as little energy and economic damage as possible. To return it to its original state should be the goal for all Alaskans.

Sincerely,
Robyn Forbes
337 W 12th Ave Anchorage, AK 99501-4416
robtyntforbes@gmail.com

From: [Tobias Schwoerer](#)
To: [Sam Owen](#)
Subject: Comments on Eklutna Hydro: The only true restoration is dam removal
Date: Friday, January 26, 2024 11:22:49 AM

Please consider these comments in the decision to fully restore the Eklutna River from its headwaters all the way to Cook Inlet.

The village of Eklutna is located on the banks of the Eklutna River for a reason. Based on my understanding, that reason was and still is SALMON.

One of the two dams has already been removed and the second dam will be removed free of charge to ratepayers.

None of the current analysis accounts for this best option. Also, none of the current analysis accounts for the potential benefits related to each option and none accounts for the future energy picture. If no further analysis is being conducted, the best option is to set a timeline for when our changing energy infrastructure will be able to allow the freeing of the Eklutna River and Lake ONCE AND FOR ALL ... FOR ALL 5 SALMON SPECIES. I support the entire removal of the Eklutna dam - removal that is free to ratepayers.

Tobias Schwoerer

Chugach rate payer and partial owner of the Eklutna Hydro Project

From: [Ingrid Everson](#)
To: [Sam Owen](#)
Subject: Fw:
Date: Tuesday, January 30, 2024 7:35:02 PM

From: Ingrid Everson <ingrid_everson@hotmail.com>

Sent: Tuesday, January 30, 2024 6:27 PM

To: //eklutnahydro.com/documents/.

Subject:

The Eklutna Hydroelectric Project deprives salmon from migrating into and out of Eklutna Lake. This mitigation plan will not revive salmon runs.

The solution to bring back the salmon is to remove the Eklutna Dam. This can be done within the next 10 years, and replacement renewable energy will then be available.

Please consider the importance of honoring the Eklutna Dena'ina people by recovering a natural river.

Ingrid Everson

From: mlhayes333@aol.com
To: [Sam Owen](#)
Subject: Let's Restore the Salmon to the Eklutna River
Date: Tuesday, January 30, 2024 4:17:49 PM

Hello--

I would like to see the salmon restored to the Eklutna River, and many who are more knowledgeable than myself have advocated how this can be done.

One cannot accomplish the return of the salmon runs, if one mile below the lake is left dry.

Most persons realize this.

So it is hoped that the Owners will remove the Eklutna Dam so the salmon can return.

Let's get this one done right. Thank you. --MaryLee Hayes, 2611 Hiland Rd., Eagle River, AK 99577

From: [Emily Cohen](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 31, 2024 4:26:22 PM

Hello,

I am in strong favor of dam removal, once other renewable energy sources are in place. The AWWU Portal option is insufficient; it would not allow sockeye salmon to spawn in Eklutna Lake, it will leave a mile of the river dry, and there are large amounts of habitat in the waters above the dam that will not be restored. After speaking with some of the experts you brought to the public comment meetings, they told me that they believe this is a good "first step" toward restoring adequate habitat and salmon populations. I am not interested in a "first step," as the time to act to restore Alaska's salmon counts and natural areas is now.

Hearing Chief Leggett of the Native Village of Eklutna (NVE) speak at the public meeting and express his displeasure in this plan should be enough to inform your decision. If you pride yourself on listening to the NVE, as you appear to by how many times it is mentioned in the Draft Fish and Wildlife Program and in your public meeting presentations, then please listen and act in accordance with NVE's wishes. This is a beautiful opportunity to engage in some small act of justice for the NVE, whose lands and waters were largely taken away and mismanaged through projects like the Eklutna Hydroelectric Dam. It is because of projects like the Dam that fish and wildlife populations are depleted, and it is through choosing to remove the dam and restore the river that healing can happen.

Please remove the dam and restore Eklutna River and Eklutna Lake. Please do so once other renewable energy sources are in place. Renewable energy, like the hydroelectric dam, is meant to help the environment. I believe in the Project Owners' ability to have renewable energy that does not come at the expense of salmon, wildlife, and Indigenous Peoples.

Thank you,
Emily Cohen, resident of Anchorage

From: reawn29@everyactioncustom.com on behalf of [Grace Hudson](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Thursday, February 1, 2024 10:48:16 PM

Dear Owners of The Eklutna Hydroelectric Project,

You should keep your word and do what you say you're gonna do and stop trying to go around the source just do it
refill the river

Sincerely,
Grace Hudson
7757 Strawberry Cottage Way Anchorage, AK 99502-3201
reawn29@yahoo.com

From: [Diane Sallee](#)
To: [Sam Owen](#)
Subject: Eklutna Lake dam
Date: Sunday, February 4, 2024 5:54:09 PM

I encourage the removal the dam on Eklutna Lake within 10 years, after other renewable energy sources are brought online to replace the hydroelectric power produced by the dam. The current Eklutna Hydroelectric Project provides 3-6% of electricity for the area. Wind, solar, and battery storage could replace this amount, and these renewables are declining in cost. Removing the dam will fulfill the 1991 agreement to let fish run from the ocean to the lake and its tributaries.

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

McHuron, E, M. Castellote. G. Himes Boor, K. Shelden, A. Warlick, T. McGuire, P. Wade, K. Goetz. 2023. Modeling the impacts of a changing and disturbed environment on an endangered beluga whale population. *Ecological Modelling* 483. 110417. 10.1016/j.ecolmodel.2023.110417.

NMFS (National Marine Fisheries Service). 2016. Recovery Plan for the Cook Inlet Beluga Whale (*Delphinapterus leucas*). National Marine Fisheries Service, Alaska Regional Office, Protected Resources Division, Juneau, AK.

Norman, S.A., R.C. Hobbs, L.A. Beckett, S.J. Trumble, and W.A. Smith. 2020. Relationship between per capita births of Cook Inlet belugas and summer salmon runs: age-structured population modeling. *Ecosphere* 11(1):e02955.10.1002/esc2.2955.

Warlick, A. 2022. Understanding the effects of environmental variability on demography in

species with complex life histories through integrated population modeling. PhD Dissertation, University of Washington, School of Aquatic and Fishery Sciences.

Warlick, A.J., G.K. Himes Boor, T.L. McGuire, K.E.W. Sheldon, E.K. Jacobson, C. Boyd, P.R. Wade, A.E. Punt, and S.J. Converse. 2023. Identifying demographic and environmental drivers of population dynamics and viability in an endangered top predator using an integrated model. *Animal Conservation* 2023. <https://doi.org/10.1111/acv.12905>.

From: [Anamika H Paulay](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 1:43:32 PM

the eklutna hydroelectric dam should be removed to help restore the salmon population rather than installing a portal in the damn. this is in-line with the native village of eklutna's request and the need to work to restore the salmon population.

From: [Gary Swan](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 4:10:53 PM

I believe the entire drainage to include the lake should be restored as salmon habitat. I am an MEA member and support the added costs to open the lake and above drainages by removal and replacement of the Existing Dam at Eklutna Lake.

From: [Lauren](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 1:37:41 PM

Please remove the Eklutna River dam after other renewable energy resources are in place. The impact on the environment and the wishes to the Native Village of Eklutna both demand that we do better. Thank you for your consideration!

From: pmcketa@everyactioncustom.com on behalf of [Pete Cleary](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Wednesday, February 7, 2024 4:04:40 PM

Dear Owners of The Eklutna Hydroelectric Project,

The Eklutna ecosystem is a gem waiting to return to its former glory.

With salmon runs in decline it is important to invest in the future of this historic salmon producing watershed.

This is an excellent opportunity to restore an ecosystem and invest in the salmon future of the Eklutna Dena'ina people who will be sustained by this resource.

The economic benefits of full restoration will outweigh the cost. The economy and wildlife will benefit from a restored fishery.

We need these fish. Alaska needs this resource. Removing the dam and full restoration makes plenty of sense. It is in everyone's best interest to take this opportunity and bring this system back. This can and should be completed.

Let us do what is right for the Eklutna people and for all Alaskans. Give the salmon a chance to come back.

Pete Cleary
M.S., Fishery Biologist- retired

Sincerely,
Pete Cleary
1585 Mission Rd Homer, AK 99603-9361
pmcketa@hotmail.com

From: [Doug O'Harra](#)
To: [Sam Owen](#)
Subject: Eklutna Dam removal comment
Date: Friday, February 9, 2024 5:19:55 AM

Hello,

The dam must be completely removed so that the river flows freely and naturally through its ancestral channel from the lake to the sea. Recreating the Eklutna River salmon cycle—with its ecological benefit to the watershed and Cook Inlet—should be our priority. Yes, this will reduce or even eliminate the flow to the Eklutna Power Plant. It may increase the cost of electricity. And there will be challenges for the municipal water supply system. But we (the community, CEA and other utilities, and the Muni) will muddle through and figure out alternatives that will work.

The carbon benefit of hydro should not blind us to that dam's historic destruction of Eklutna's wild salmon runs and the subsequent incremental degradation of the entire watershed. Removing that dam is a once-in-a-century opportunity for the community that will deliver priceless ecological, recreational and social justice benefits. We can find and develop alternative sources of power. There is no comparable alternative to a fully restored Eklutna River.

As a homeowner and rate payer, I'm willing to bear my share of increased power costs to help make this happen. I walk the talk too—we have 18 solar panels on the roof of our home.

Sincerely,

Doug O'Harra
2800 Alder Drive
Anchorage

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Michal Stryszak](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 9, 2024 4:06:14 PM

I am an anchorage resident. Please reopen flow to the river so that the salmon can come back. Having vibrant salmon streams is a Huge boost both to the people of anchorage and to the wildlife. Thank you.



Ninilchik Traditional Council

P.O. Box 39070

Ninilchik, Alaska 99639

Phone: 907 567-3313 / Fax: 907 567-3308

E-mail: ntc@ninilchiktribe-nsn.gov

ninilchiktribe-nsn.gov

February 9, 2024

Submitted via Email to:

Samantha Owen <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', followed by a horizontal line.

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>

From: smith.m2397@everyactioncustom.com on behalf of [Mandy Smith](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Tuesday, February 13, 2024 12:02:53 AM

Dear Owners of The Eklutna Hydroelectric Project,

I am incredibly disappointed with the project owners disregard for the land and the original inhabitants of the land. By choosing the cheapest solution they also choose to continue the unjust degradation of the Eklutna Village's most precious resource- salmon. As they continue to destroy salmon habitat, the owners greenwash their project in order to confuse taxpayers into thinking this is the most eco-conscious choice. Let's not fall victim to their immoral marketing and support a full restoration of the Eklutna river via dam removal or flows much higher than those proposed. Free the Eklutna River!

Sincerely,
Mandy Smith
220 W 12th Ave Anchorage, AK 99501-6801
smith.m2397@gmail.com

From: [Alex Petkanas](#)
To: [Sam Owen](#)
Subject: Eklutna Comment
Date: Thursday, February 15, 2024 2:50:46 PM

To whom it may concern:

I am a homeowner and Chugach Electric member-owner in the Municipality of Anchorage. I am writing in my personal capacity today to support the Native Village of Eklutna's goal of restoring the river and full water flows to support salmon and other species - specifically through adoption of a plan that ends with complete dam removal.

The current proposed mitigation plan does not go far enough, fails to provide for fish passage into the lake and upstream habitat, does not have the support of the public, and would only release 3% of historic water flows.

Dam removal, in the alternative, would meet the recommendations of biologists from USFWS, NMFS, and NVE. It would begin to address a century of cultural and environmental neglect in this region, and be a step toward greater recognition of tribal sovereignty. While dam removal cannot happen overnight, it is possible and essential to adopt a plan that allows for onboarding of new renewable energy projects.

I urge you to strongly consider dam removal, and if necessary, to take additional time to do a full analysis of how to best meet the needs of NVE and the Owners of the project.

Sincerely,
Alex Petkanas

From: [Bart Meyer](#)
To: [Sam Owen](#)
Subject: Comment on. The Draft Fish and Wildlife Program - Eklutna Lake
Date: Thursday, February 15, 2024 4:55:05 PM

I do not support the alternative proposed by the utilities that would not restore water flow to the full river and does not provide for fish access to the lake and upper tributaries.

The fish and wildlife plan should be a long term solution. By that I mean to look to plan for a 100, 500 year solution.

What is proposed accepts that the infrastructure established in the past, and the habitat harm that has resulted, is the new base to plan from. That is short sighted.

Imagine instead a river/lake system with natural salmon runs with all the benefits of such to wildlife and humans.

I do support the alternative proposed by Eklutna Native Community with, in part: full length river water flow, fish access to the lake and upper tributaries, ten years to allow for alternate power generation sources to come on line. I recognize this is an expensive alternative, however, it is the only alternative that remediates the impacts of the past in a meaningful way for the benefit of all Alaskans in the long term.

I am a 65 year Alaskan having lived in Kenai, Anchorage, Fairbanks, and Sitka. I have commercial, sport and subsistence fished for salmon. I am an active hunter for subsistence purposes.

Bart Meyer,
Sitka

From: [Chantal deAlcuaz](#)
To: [Sam Owen](#)
Subject: Eklutna hydroelectric project
Date: Thursday, February 15, 2024 4:54:57 PM

To whom it may concern:

This comment is regarding the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River. I'd like to start by expressing my disappointment in the format of the public meetings. The meeting I attended in Anchorage began with a presentation by a contractor employed by the utilities, without opportunity for other perspectives or rebuttals. The public was isolated for their submission of testimony rather than being able to hear from one another. I fear that the format was deliberately designed to obscure the growing consensus that the restoration plan presented is at best insufficient, and at worst, unjust.

Regarding the mitigation plan, I'd like to express my passionate support for the community alternative – namely, complete dam removal, once other sources of renewable energy have been secured.

For years now, my utility, Chugach Electric Association has been painstakingly slow to add renewable energy to the grid. Now, it is using the loss of a small amount of renewable power – approximately 3% of its total production – and subsequent rate hikes as its rationale for this inadequate plan. Pitting salmon against renewable energy is a false choice. And no amount of money saved or costs avoided can justify perpetuating the shameful legacy of colonization.

Unlike the "AWWU portal" plan, the community alternative would create a continuous flow of water from the lake to the ocean, for the restoration of all five species of salmon, as well as for the fish to return to tributaries above the lake. We have a generous commitment from nonprofit groups to remove the dam so that the rate payers and tax payers will not have to bear the cost of dam removal. Most importantly, we have a historic opportunity to restore salmon and to right a wrong that the Eklutna people have born for generations. I sincerely hope the the powers that be come to their senses, so that we won't squander the rare opportunity to wrong the rights of the past and restore salmon, beloved by all Alaskan, to this river.

Respectfully submitted,
Chantal de Alcuaz

From: [Gabrielle Markel](#)
To: [Sam Owen](#)
Subject: Eklutna Public Comment
Date: Friday, February 16, 2024 1:54:52 PM

Hello,

I am a ratepayer of Chugach Electric living in Anchorage and I am writing you to voice my support for the Community Alternative put forth by the Native Village of Eklutna.

As a ratepayer, I have no interest in paying for a 57 million dollar project that will not *meaningfully* restore the river. The current plan put forth in the Draft Fish and Wildlife Program, with the flow being restored below the AWWU portal valve, seems like an expensive bandaid that does not meet the asks of the Native Village of Eklutna to have this watershed fully restored, and so sounds like a waste of money to me.

I support their desire to have the Eklutna Dam completely removed at a later date, once replacement renewable energy is available to replace the hydro we get from Eklutna. The Eklutna river is a community asset not only to the Eklutna Tribe, but to Southcentral Alaska residents as a whole, and our utilities and municipality, have a responsibility to act as community stewards. Please work toward a *real* solution - I am fine with the necessary rate hike that will accompany a project of this size as long as it will lead to true restoration of this important watershed and the cultural implications it carries.

Thanks for you time,

Gabrielle Markel
Anchorage Resident

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Georgia gustafson](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 16, 2024 7:33:04 PM

Please remove The Eklutna Dam to fully RECONNECT the River and return the water flows needed to support the river's fisheries.

Thank you for hearing my urgent request.

From: [Barry Santana](#)
To: [Sam Owen](#)
Subject: Comments on the Eklutna Draft Fish and Wildlife Program
Date: Saturday, February 17, 2024 5:49:22 PM

Thank you for the opportunity to comment on the Eklutna Draft Fish and Wildlife Program document. I appreciate the work you have done on the historical, contractual and alternative modification construction options to maintain hydro power for Chugach Electric/Matanuska Electric and protect the water supply for Anchorage. Your efforts are commendable; however there appears to be considerable differences of opinion on the best way to execute the 1991 Fish and Wildlife Program. It appears to me that most of the effort in the draft Plan is not for the fish and wildlife but for economics and ease of execution to modify in-place infrastructure. The simplest alternative, removal of the existing dam and restoration of the original river channel is missing. I find the **recommended solution presented in this draft to be based on unrealistic modeling¹ and it falls woefully short for the fish and wildlife.**

I am a double MEA ratepayer, so I appreciate the need to keep utility rates low. However, based on your report we are talking about at most only 6% of Chugach/MEA power generation. Other informed sources state¹ "The Eklutna Hydro Project produces 40-47 MW, which is 2.2% of the Railbelt's 2000 MW installed generation capacity. As a portion of CEA and MEA combined installed generation capacity, it's about 3.5% ". As a double MEA ratepayer, I would appreciate it if the economic portion of your draft proposal could clearly state what rate increase from ~\$0.22/kWh I would incur **if NO power was currently available from Eklutna Hydro**. This should be a single sentence addition.

Recently electric rates have been in the news due to the fact that Cook Inlet (CI) gas is rapidly running out; 2 to 5 years has been stated in sources. Several solutions have been discussed: (North Slope NG pipeline-\$50+ billion, 10 years minimum; major State subsidies for CI Producers, many \$ billions; or imported LNG, higher costs). These all require State investment or subsidies with an accompanying electric rate increase estimated to be 50% to 100%. So what will Chugach and MEA do for the other 94 to 96.5% of their power generation? They will raise member electric rates 50 - 100%, I suspect. The increase to ratepayers for missing Eklutna hydro power will be relatively minor I believe. It would be simple for me to approximate the future impact on my power costs if you provide the information above regarding the current removal of Eklutna Hydro from the rate.

My preference for the Plan is to restore the five species of salmon to a pre-1914 Eklutna Lake watershed. That is not difficult according to UAF professor Dr. Peter Westley. He has recently stated "Salmon can recover quickly if given a chance." Removal of the dam would allow Chinook, coho and sockeye salmon (the most sought after species) to have a chance to repopulate the river, lake and tributaries, which is 65% of their available habitat. Over time, the watershed has the potential, with a resurgence of nutrients from spawned out fish, to also support native Dolly Varden and trout.

The Community Supported Alternative to remove the dam and restore the river channel has been offered funding by The Conservation Fund and Trout Unlimited at no cost to electric utility ratepayers. They have already removed a lower dam successfully in 2018 with this approach. The effort may be delayed for up to ten years to allow the utilities to replace the relatively small Eklutna Dam baseload generation (2-6% of current generation) with renewables, like wind and solar. Backup baseload reserve to support the renewables when the sun isn't shining and the wind isn't blowing could be easily provided on the rail belt by the planned 160,000 MWh Dixon Diversion to Bradley expansion or the 1.2 GWh utility-scale long-duration Pumped Thermal Energy Storage Project near Healy selected by US DOE in September 2023.

This latest Community Supported Alternative recommended by NVE could save the utilities and

ratepayers money and let Nature take us back to the watershed and salmon runs of the early 1900s. This option should not impact the AWWU water line serving Anchorage. The water intake is lower than the lake elevation managed for hydropower lows. There have been concerns regarding the water line within the river bed and downstream bridges under extreme flows, but those are both solvable engineering issues. This is a relatively simple solution compared to the complex scheme proposed in the current plan. **I strongly support the removal of Eklutna Dam and return of the early 1900s Eklutna River in the old drainage.** Evaluation of this alternative needs to be added to the Eklutna Draft Fish and Wildlife Program document. To present anything less, shortchanges the Fish and Wildlife aspect of the Plan and does not satisfy requirements of the 1991 Agreement.

More concerning, in my opinion, is Bretwood Higman's comment here about potential large-scale landslides above Eklutna Lake and accompanying lake tsunamis. These potential events will affect any option; during higher water levels with a dam breach results could be more catastrophic than a natural lake and downstream flowing river. Lower lake levels and the natural river drainage may offer a surge capability of sorts. Eklutna Village and surrounding areas need to learn more about this concern.

Reference: 1. *"Bring back a once-thriving salmon river"; Email, SalmonState, February 17, 2024.*

Thank you for your consideration of my comments,

Barry W. Santana, PhD PE
Wasilla, Alaska

From: d@everyactioncustom.com on behalf of [David Wellman](#)
To: [Sam Owen](#)
Subject: Choose the "Community Alternative" for the Eklutna River
Date: Saturday, February 17, 2024 11:59:30 AM

Dear Operators of the Eklutna Hydroelectric Project,

I strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. Removing the dam would restore salmon to the river and take us one step closer to the restoration of our home planet.

Sincerely,
David Wellman
Copper Center, AK 99573-9703
d@welm.us

From: dzim54@everyactioncustom.com on behalf of [David Zimmer](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Saturday, February 17, 2024 3:13:22 AM

Dear Owners of The Eklutna Hydroelectric Project,

Regarding the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River, I support the Native Village of Eklutna's vision for river restoration. I think you should consider building a new dam that would fully reconnect the river and return the water flows needed to support the river's fisheries and provide water and power generation for Anchorage. We want fish, water, power, and to be good stewards of the land. We will all pay our share of the project. Let's get the project started.

--DAVID ZIMMER

Sincerely,
David Zimmer
7155 E Shorewood Dr Wasilla, AK 99654-4654
dzim54@gmail.com

From: dlburwen@everyactioncustom.com on behalf of [Deborah Burwen](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River
Date: Saturday, February 17, 2024 11:21:35 AM

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River.

Unfortunately the proposed plan would continue to prohibit salmon from returning to the lake and upper tributaries to spawn. The plan would also fail to return the river to its historic flow levels, further impacting habitat and wildlife.

As an Anchorage resident and taxpayer that has recreated in the Eklutna watershed many dozens of times in the past 35 years, I strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. Not only would removing the dam restore salmon to the river, it would avoid financially burdening utility ratepayers and MOA taxpayers with a short-term, insufficient plan. Instead, the dam removal costs could be covered by two nonprofit organizations who have agreed to pay for it.

You have the opportunity to be leaders in learning from historic mistakes of damming rivers, in restoring a wild salmon run, and in righting a historic wrong on the Eklutna River.

Sincerely,
Deborah Burwen
Anchorage, AK 99501-4268
dlburwen@gmail.com

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Jonas Banta](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, February 17, 2024 1:35:51 PM

I am writing as a private individual, not in my former role with the Alaska Center. I am also writing as a lifelong resident of ANchorage Alaska, as an ecologist, as an Indigenous person, and as an advocate for renewable energy. Any Fish and wildLife program which does not explicitly attempt to restore populations for each species of salmon impacted by the hydroelectric project, including access to the entire stretch of habitat, from mouth to headwaters, is an unequivocal failure of the owners to live up to the requirements and expectations of the 1991 agreement, as well as their responsibility as public utilities to the Native Village of Eklutna, to the community of Anchorage, and to the integrity of their respective organizations. This reality has been embodied throughout the restoration process by the explicit manipulation of the study and review process, by the willful negligence of Mayor Bronson's management, by the misrepresentation of data, methods, and community perspectives by Macmillen Jacobs to the owners and the public, and by the secret contractual commitment with AWWU. In fact, every aspect I mentioned before, and countless others I have personally born witness to are nothing short of shameful. Every escalation of resistance to the owner's process is a direct consequence of their management of this project, and indeed the certain continued escalation and ensuing waste of taxpayer and ratepayer funds will also be a direct consequence and responsibility of the owners management as well. It is with clarity and urgency that I call upon the owners of the hydroelectric project follow through on their ultimate responsibility and select the community alternative, for the wellbeing of our community and future generations.

From: river@everyactioncustom.com on behalf of [River Bean](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River
Date: Saturday, February 17, 2024 10:47:22 AM

Dear Operators of the Eklutna Hydroelectric Project,

Please take out the dam at Eklutna Lake and restore it to what it used to be, a salmon run and natural beauty.

Sincerely,
River Bean
Palmer, AK 99645-8604
river@arcticorganics.com

From: sjfleischman@everyactioncustom.com on behalf of [STEVE FLEISCHMAN](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River
Date: Saturday, February 17, 2024 11:19:27 AM

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River.

Unfortunately the proposed plan would continue to prohibit salmon from returning to the lake and upper tributaries to spawn. The plan would also fail to return the river to its historic flow levels, further impacting habitat and wildlife.

As an Anchorage resident and taxpayer that has recreated in the Eklutna watershed at least one hundred times in the past 35 years, I strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. Not only would removing the dam restore salmon to the river, it would avoid financially burdening utility ratepayers and MOA taxpayers with a short-term, insufficient plan. Instead, the dam removal costs could be covered by two nonprofit organizations who have agreed to pay for it.

You have the opportunity to be leaders in learning from historic mistakes of damming rivers, in restoring a wild salmon run, and in righting a historic wrong on the Eklutna River.

Sincerely,
STEVE FLEISCHMAN
Anchorage, AK 99501-4268
sjfleischman@ymail.com

From: [Tony DeGange](#)
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Preferred Alternative
Date: Saturday, February 17, 2024 12:37:06 PM

To the Operators of the Eklutna Hydroelectric Project:

I am resending my letter from yesterday that corrects a minor error.

This is a momentous opportunity to do something grand for natural resources conservation in the Anchorage area - restoration of what might have been the biggest salmon fishery in the entire Municipality. We owe it to the Native Village of Eklutna and to all the residents of the Municipality. Unfortunately, the preferred alternative of the Operators falls short. It is the least expensive option and has the smallest impact on current renewable power generation, but also produces the smallest gains in water flows and fish habitat. And because it relies on the AWWU portal it does not restore connectivity to the lake which means restoration of a modest sockeye salmon run will not occur. I could probably be talked into supporting an alternative that relies on the AWWU portal provided it was an interim solution that would eventually be eclipsed, in say 10 years, by a better alternative that restores full connectivity from the lake to the Inlet. An interim solution involving the portal would also provide additional time to bring other sources of renewable energy on line to replace that lost through reduced hydro generation especially in the winter. There are a number of other alternatives proposed by the Native Village of Eklutna, Trout Unlimited, The Conservation Fund, the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service that do a far better job of improving fish habitat and restoring fish populations. Dam removal is also something that should be evaluated. The U.S. Fish and Wildlife Service said it well in their comments, "The Program should provide connectivity to the lake, release year-round flows to support salmon spawning and rearing habitats throughout the river corridor, and accommodate periodic high-volume flows for maintaining characteristics through a self-sustaining dynamic equilibrium between the hydrograph and natural sediment supply."

This is our opportunity to do something right, to right a wrong, and treat a neglected and abused river in a way that we can all be proud.

Sincerely,
Anthony R. DeGange
Chugiak, Alaska

From: [Aurora Roth](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Sunday, February 18, 2024 12:09:44 PM

To the Owners of The Eklutna Hydroelectric Project,

I am commenting on the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River. The preferred restoration option of using existing AWWU infrastructure, leaving 1 mile of the river disconnected from the lake, and releasing only 3% of historic flows is insufficient and disappointing. The Native Village of Eklutna (NVE) has shared many times that their vision for the Eklutna River is to fully remove the dam. While this is the most expensive option for the owners and presents challenges, I believe that creative solutions can be found with the two year extension that the Anchorage Assembly has proposed. I urge the owners to support the dam removal option and work toward legal pathways to allow for two more years of study and planning to make this a reality.

As an earth scientist myself, I appreciate the years of study and work that have gone into developing the different restoration pathways in this process. I've also been following the updates and discussion at Chugach Electric Association board meetings for the last year. I believe the Eklutna Hydroelectric Project owners have been, in good faith, trying to find an acceptable restoration solution. However, the restoration of the Eklutna River and the Draft Plan, do not exist in isolation of other challenges on different timescales – from colonization and the destruction of the NVE's relationship to the river in the early 1900s, to the current gas crisis and need for renewable energy.

The importance of Eklutna to our renewable energy needs and the desire to keep energy costs low has been repeatedly stated by the owners, but how do we weigh this with the unprecedented opportunity to correct a historical injustice and center the needs of the Native Village of Eklutna? How do we assess the value of a thriving river with all five species of salmon to our communities against our energy costs? I know the owners have been grappling with these exact questions. The current timeline to provide a draft plan to the governor by April 2024 does not allow for an adequate resolution to these questions. Continuing to move forward with a plan that does not meet NVE's goals for the river is a missed opportunity.

The utilities have plans to adopt more renewable energy in the coming years (and doing so would lead to lower energy costs than continuing to rely 80% on gas). If larger renewable energy projects and associated storage for regulation are brought online, the argument of keeping the Eklutna dam and hydroelectric project for our renewable energy portfolio begins to dissipate. While I understand the 1991 Agreement may not necessarily legally require complete restoration and a return of the river to historic flows, it's about doing what's right and seeing this as an opportunity. The Native Village of Eklutna and conservation

organizations are ready to work toward creative solutions, to raise money to ease the financial burden to ratepayers, and to share a common goal with you, the project owners. The question is whether you choose to work toward what is right, despite the challenges, or hide behind legal language while knowing your current preferred option will result in dollars spent toward a solution that does not meet everyone's needs.

Thank you for the opportunity to comment.

Aurora Roth

rothaurora@gmail.com

1736 Aleutian St

Anchorage, Alaska 99508

--

Aurora Roth (she/her)

PhD Student - Climate, Oceans, and Atmosphere Program

Scripps Institution of Oceanography, UC San Diego

cell: 907.460.2193

Check out the [tuition-FREE field science](#) and [outdoor education](#) program that I'm involved in!
[Inspiring Girls Expeditions \(inspiringgirls.org\)](http://inspiringgirls.org)

From: [Austin Quinn-Davidson](#)
To: [Sam Owen](#)
Cc: samc@chugachboard.com; sisic@chugachboard.com; rachelm@chugachboard.com; [Susanne Fleek-Green](mailto:Susanne.Fleek-Green@chugachboard.com); bettinac@chugachboard.com; markw@chugachboard.com; Jimn@chugachboard.com
Subject: Comments on the Eklutna Draft Fish and Wildlife Program
Date: Sunday, February 18, 2024 4:33:01 PM

Dear Ms. Owen and Chugach Board members,

I am writing to express my support for full restoration of the Eklutna River, consistent with the desires of the Native Village of Eklutna, multiple community organizations, and the majority of my neighbors and community members who have spoken up on the draft program to date. There are multiple reasons why the owners should pursue full restoration, i.e. removing the dam and restoring fish passage.

- As a rate payer and property tax payer, I am concerned about the cost of the AWWU portal option. We get essentially nothing for \$57M. Dam removal would be cheaper and achieve full restoration of the river. As you are aware, two conservation groups have generously offered to pay for dam removal - and even graciously agreed to give you ten years to replace Eklutna hydro's energy generation, a mere 2-3% of Anchorage's energy. That's ten years on top of the 30 we've already been waiting for restoration of the river. The CEA letter shared with Anchorage Assembly members disingenuously compared this potential dam removal to the Klamath dam removal effort. Giving CEA staff and lawyers the benefit of the doubt, perhaps they are not aware that the Klamath effort entails removal of FOUR large dams on a much more complex river system spanning two states, with multiple invested parties and an adversarial history. My wife works for a Tribal organization engaging in this work. The Eklutna dam is not at all similar, and dam removal would be paid for a third party. This comparison was and is inaccurate.
- Dam removal honors Native values and historic and current uses of Dena'ina land and waters. The Native Village of Eklutna asked for evaluation of dam removal before the owners put forward their preferred alternative in the Draft; the owners didn't analyze it then, and still haven't. Refusal to do so is both disrespectful and financially reckless.
- Dam removal is better for fish and wildlife. I won't go into detail on why a natural, free flowing river is better for fish than a pipe, because that should be obvious.
- None of the parties except the utilities think the AWWU portal option is the best option. Please follow the advice of NVE, conservation groups, and the federal agencies engaged in this work.
- The 1991 Agreement envisioned that this process and the mitigation resulting from it should be as robust as would typically be required. The AWWU portal option and the process leading to it has not met this standard.

I have been interested in and watching this process for years, first as an elected official and now as a member of the community. As someone intimately familiar with public processes, I have honestly been shocked by yours. Having public meetings where the public can't speak? Not truly analyzing an option that a majority of folks, including the local Tribe, have requested? Signing a secret deal with AWWU before the public process theoretically begins? It is shameful.

I urge you to graciously admit your mistakes - it's not too late - and truly partner with NVE to move toward a program that restores the Eklutna river and the harms perpetuated for decades. If you need more time to do this, I suggest a delay to the program (which, by the way, despite

what CEA claimed in its letter, is not impossible - an agreement can be amended by the parties).

Thank you,

Austin Quinn-Davidson
Former Anchorage Acting Mayor, 2020-2021
Former Anchorage Assembly member, 2018-2023

February 18, 2024

To operators of the Eklutna Hydroelectric Project,

We were saddened to read what you proposed for returning water to revive the Eklutna River and its five species of salmon in draft Fish and Wildlife Plan. How can a non-contiguous flow of water from Eklutna Lake to the Inlet be considered an option? This plan does not meet your legal obligation to mitigate the project's impact to fish and wildlife. As we understand it, your proposal would still leave almost a mile between the lake and the "river" with no water flowing?? Also, the amount of water you suggest, (3 percent of the historic amount of water in the river) seems like a paltry amount for fish to survive. Steve and I don't see how anyone serious about really restoring this fishery could actually support this proposal. We feel that this is an attempt to deal with the problem without really coming up with a viable solution. Your recommended proposal will not restore the river's salmon runs and is unacceptable.

The Eklutna people and all Alaskans expect that this wrong be corrected. It is obvious to us that you need to remove the second Eklutna Dam to fully reconnect Eklutna Lake to the Inlet via Eklutna River. In addition, it is a no brainer for anyone who knows anything about salmon, that adequate, year-round flows of water from Eklutna Lake all the way to Cook Inlet are necessary for successful reintroduction of viable salmon runs. This should be the minimum requirement in your proposal for this wrong to be corrected.

We have lived in the Peter's Creek area since 1985, so we understand the need for the energy provided by the hydro power plant, but a viable proposal would address this issue and look at options for renewable energy that could replace this need. There have been huge improvements in our ability to harness energy in other ways including wind, geothermal, tidal options and certainly, in the summer, solar energy. Your proposal needs to look toward the future and suggest options that will actually bring the salmon back. As we understand it, there is a commitment from The Conservation Fund to orchestrate and fund removal of the second Eklutna Lake Dam. They already helped with the more expensive, bigger dam down river, so why not take advantage of this offer? It is at least a start toward moving to a permanent viable solution.

The Eklutna Hydroelectric Project deprives the Eklutna River of water and blocks salmon from migrating in and out of Eklutna Lake. Salmon populations will never recover without a reliable and consistent supply of water and access to important up-stream spawning and rearing areas. This is particularly true for sockeye salmon. If they can't access Eklutna Lake and its tributaries they cannot survive. All involved parties cannot meet their mitigation obligations without removing the second dam as a start to solving the problem, in my opinion.

The Native Village of Eklutna has been clearly wronged and a majority of Alaskans also feel that protecting and revitalizing all waterways that have, or once had, healthy salmon runs is very important. Locals and visitors alike are in favor of a proposal that will bring back the wild salmon species in healthy numbers to the Eklutna River, including Eklutna Lake and headwater tributaries.

Owners of the Hydroelectric Power Company and other involved parties need to make this right and not propose something that will cost a lot of money and still NOT FIX THE PROBLEM you are tasked with. Please invest in revitalizing the Eklutna River so that it is a viable habitat for the five species of salmon and right a wrong that has already taken too long to be resolved. This is something that you could take great pride in and show your support for the Native community that depended on the salmon, Alaskans, and our beautiful state's resources.

Sincerely,

Barbara A. Johnson

Steve C. Johnson

From: candicekotykllc@everyactioncustom.com on behalf of [Candice Kotyk](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River
Date: Monday, February 19, 2024 9:17:42 PM

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity of a public comment period on the draft Fish and Wildlife Plan proposed for the Eklutna River.

While I am not fully aware of our energy situation and all the details surrounding the future of our energy creation and consumption, I still strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. They feel strongly that removing the dam will restore the salmon to the river, and that the dam removal costs could be covered by two nonprofit organizations who have agreed to pay for it. I agree that at this point we should work to find other ways to create/harness energy, and make the choice that returns the river to its natural state before the dams were built.

Damming rivers has rarely been the right choice for local people. There are many examples of this from around the world, throughout history. By restoring the wild salmon run, you would be righting a historic wrong on the Eklutna River.

Sincerely,
Candice Kotyk

Sincerely,
Candice Kotyk
Anchorage, AK 99516-2865
candicekotykllc@gmail.com

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Deborah A Kearney](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, February 18, 2024 11:26:44 AM

To the operators of the Eklutna Hydroelectric Project,

I am writing regarding the Eklutna River and your draft Fish and Wildlife Plan. As I read it, your proposed plan does not meet your obligations to the Eklutna Peoples, including the restoration of an accessible salmon run. It is an inadequate plan that leaves a mile of the river dry and releases only a small fraction of the past flow of the river. It is an inadequate plan that does not provide fish passage into the lake and upstream habitat.

The best plan would be to remove the Eklutna Dam and fully return the water flows that support the salmon and other river fisheries. The Native Village of Eklutna wants the river restored. Many Alaskans and those watching this unfold from outside Alaska support the removal of the dam and the restoration of the river. The salmon need a consistent supply of water and access to spawning areas in order to recover.

I see you are proposing the removal of the dam a decade from now, but that may be too late. I support removing it sooner.

Thank you for your consideration.

From: [Janice Banta](#)
To: [Sam Owen](#)
Subject: Public Comments on Power Companies Draft Eklutna River Fish and Wildlife Plan
Date: Sunday, February 18, 2024 5:33:33 PM

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River.

I request the power companies (MEA, CEA and MOA) adopt the community alternative for restoring the Eklutna River based on the following factors:

Restoration of culturally and biologically significant salmon runs:

Adopt the “community alternative” of dam removal to bring back a once-thriving salmon river to its historic capacity, thus providing restoration of culturally significant salmon resources to the Eklutna Tribe and access to large multi-species salmon runs to residents of Southcentral Alaska. Only restoration of significant in-stream flow from mouth to headwaters will fulfill the requirements of the 1991 agreement. Anything that does not do so leaves the power companies liable for not meeting the agreement requirements and open to legal action for not doing so.

Zero effects on the electricity in South Central Alaska:

Eklutna hydroelectric currently is a source of only 2.2% of the Railbelt’s energy capacity. The community alternative, which calls for the removal of the dam, would take place within the next decade, and only when replacement renewable energy is expected to be available. It is shameful that the power companies never evaluated dam removal despite being requested to multiple times and then used their own hand picked consultant to deliver one-sided information to support the abrogation of their duty under the 1991 agreement. It is significant that the hydro project remains still operational even with the dam removed!

Zero effects on drinking water:

The water intake is located low in the lake and if the dam were to be removed, the lake would return to natural levels and leave the water intake (as well as the hydro intake) unaffected.

Power companies’ proposal puts increased costs on the backs of ratepayers and abrogates their fiduciary responsibilities:

The proposal in the draft plan from the hydroelectric project owners would cost ratepayers and taxpayers an estimated \$57 million, while the community alternative replaces the Eklutna hydro capacity and removes the dam at no cost. This power company plan predicts rate increases of .65% for CEA ratepayers, .87% MEA ratepayers, and \$0.54 annually for Anchorage taxpayers. And, this does not include any consideration of legal costs once a poor decision heads to court.

Summary:

The deeply flawed power company proposal generated by a one-sided, poorly run technical review process along with the refusal to incorporate community input during the “working group” process also leaves a mile of the river dry, which prevents salmon returning to the lake

and upper tributaries. In contrast, the removal of the dam (community alternative) would be paid for by two non-profit organizations that have agreed to cover the costs. Why are the power companies ignoring a cheaper and more community-oriented proposal and instead pushing blindly ahead with an ill-considered option that puts additional costs on the backs of rate payers? This is truly headed to court and throwing away ratepayers money beyond even the \$57M initial cost. Furthermore, it is unconscionable that the power companies are choosing to not honor the Municipal Assembly request to wait two years for making this significant decision, especially when the Assembly's interests have not been included or even represented during this terribly flawed review process.

Closing:

I strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. Not only would removing the dam restore salmon to the river, it will avoid financially burdening utility ratepayers and MOA taxpayers with a short-term, insufficient plan. Instead, the dam removal costs could be covered by two nonprofit organizations who have agreed to pay for it.

You have the opportunity to be leaders - learning from historic mistakes of damming rivers, by restoring a wild salmon run, and in righting a historic wrong on the Eklutna River all while making the appropriate fiduciary decision for rate payers.

Sincerely, Joe Banta

Eklutna Dam Issue	Community Proposal	Power Company Proposal
COST	Zero cost to ratepayers	\$57M on backs of ratepayers and headed to litigation
DAM REMOVAL	Yes	No
DRINKING WATER	No effect	No effect
SALMON RUN RESTORATION	Yes	No
CULTERALLY RESPONSIVE	Yes	No
PROPOSAL DEVELOPMENT	Consensus based	One sided and technically flawed

From: [Andrea James](#)
To: [Sam Owen](#)
Subject: Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 9:31:02 PM

To whom it may concern:

Since the Eklutna Hydroelectric Project became operational in 1955, it has caused the Eklutna River to run dry. The amount of power being produced by the hydro-dam is not sufficient to warrant leaving the Eklutna River disconnected from Eklutna Lake. The salmon migration has been blocked for long enough. The Native Village of Eklutna's alternative plan to remove the dam would allow for the recovery of Chinook, sockeye, and coho salmon, by re-connecting the river to the lake.

Tsin'aen (thank you),

Andrea James

This e-mail message may contain confidential, proprietary or legally privileged information. It should not be used by anyone who is not the original intended recipient. If you have erroneously received this message, please delete it immediately and notify the sender. The recipient acknowledges that any views expressed in this message are those of the individual sender, and no binding nature of the message shall be implied or assumed unless the sender does so expressly with due authority of [Chickaloon Village Traditional Council](#). Before opening any attachments please check them for viruses and defects.

From: agrappoport@everyactioncustom.com on behalf of [Ann Rappoport](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 2:58:27 PM

Dear Owners of The Eklutna Hydroelectric Project,

It's time to remove the Eklutna Dam and work to restore precious salmon runs all the way up the Eklutna River, including into the lake! This will mitigate the 73-year impact of the dam and fulfill the 1993 Mitigation Agreement that was signed by all involved parties. Dam removal will restore salmon that have been important to the subsistence and culture of the Eklutna people who live in the area.

I recognize that the power from the dam - only a fraction of what Anchorage uses each year - may seem more important as a clean energy option as our gas supplies are drying up over the next several years. But a smart alternative has been proposed that will protect the energy provided by the dam while it is most needed, and will also allow the restoration of this important subsistence, cultural, and ecological resource.

That option is the one that has been carefully studied and is supported by not only the federal agencies with responsibility for the fish and associated natural resources of the Eklutna area (U.S. Fish & Wildlife Service, National Marine Fisheries Service), but also the Eklutna tribe that has subsisted here for generations, and conservation groups such as the The Conservation Fund and Trout Unlimited.

I urge you to accept and implement this option, which is to remove the dam in 10 years. This will provide enough time for planned renewable energy projects to come online. Moreover, two groups have come forward to generously cover the full cost of dam removal, so that Anchorage ratepayers will not be burdened. We owe a tremendous debt of gratitude to the Conservation Fund and Trout Unlimited for providing these funds. This will save ratepayers money and restore an environmental gem to Anchorage. Most importantly, it's the right thing to do.

By the way, I am not new to this discussion, or the science behind the proposal. I was the Field Supervisor for the Anchorage Fish and Wildlife Field Office in the 1990s and 2000s when the mitigation plan for the Eklutna River was first being developed. Back then we worked with all the involved groups, including the Conservation Fund, the Eklutna Tribe, and the Municipality to determine how to best restore the salmon and the river so that all would benefit. It's time to put this best option of dam removal in place!

Sincerely,
Ann Rappoport
17053 Aries Ct Anchorage, AK 99516-5316
agrappoport@gmail.com

From: [Brandon Hill](#)
To: [Sam Owen](#)
Subject: Eklutna Public Comment
Date: Monday, February 19, 2024 6:17:24 PM

Note: For public record I am submitting the following letter on behalf of Native Movement. It was signed by 118 individuals across Alaska and the country in support of the Community Alternative put forth by the Native Village of Eklutna. The spreadsheet with their names and contact information is also shared below. Thank you ~ (this e-mail was also submitted via brandon@nativemovement.org but our domain is down today)

To Whom It May Concern,

Thank you for the opportunity to comment on the Eklutna Hydroelectric Project. Native Movement is a statewide non-profit organization dedicated to building people power, rooted in an Indigenous worldview, toward healthy, sustainable, and just communities for all.

The Eklutna Dena'ina peoples have relied on and carefully stewarded the Eklutna River's rich salmon runs since time immemorial. The proposed Eklutna Hydro Plan is inadequate to protect salmon and the Eklutna Dena'ina peoples. We therefore support the Community Alternative put forth by the Native Village of Eklutna. This alternative respects the Native Village of Eklutna's stewardship and addresses decades of cultural and environmental neglect. It would restore the natural flow of the Eklutna River and its salmon habitat, allowing the salmon to return to their spawning grounds. It would also save ratepayers money and allow for the transition to new renewable energy projects. To learn more, check out these [FAQs](#) compiled by the Eklutna River Restoration Coalition.

Additionally, Native Movement supports the Anchorage Assembly's resolution [AR 2024-40](#) that passed unanimously and seeks a two-year extension of the 1991 agreement. This extension would provide an opportunity for more meaningful consultation between the Native Village of Eklutna and the project owners (Chugach Electric Association, Matanuska Electric Association, and the Municipality of Anchorage).

We stand with the Native Village of Eklutna in demanding a long-term solution that restores the Eklutna River to its natural condition.

Signed,

Last	First	Home Phone	Address	City	State/Province	Zip/Postal	CountryCode	CountryName
Sorge	Sven		35 BARSTR	Berlin	DE	10713	US	United States
Apok	Charlene		9205 Commons PI	Anchorage	AK	99502	US	United States
Hayden	Jaime		310 Broadway Ave N	New Richland	MN	56072	US	United States
Smith	Esther		1326 Medfra St	Anchorage	AK	99501	US	United States
Markham	Claudia	9074796122	1446 Grenac Rd	Fairbanks	AK	99709	US	United States
Urquia	Morgan	8043639396	5805 N Farm Loop	Palmer	AK	99645	US	United States
Mouw	Rika	9072357455	PO Box 4084	Homer	AK	99603	US	United States
CLAUS	SANTA	9073883836	PO Box 55122	North Pole	AK	99705	US	United States
Pizzuto	Vanessa		14279 Caminito Lazanja	San Diego	CA	92127	US	United States
Kramer	Emma		PO Box 1138	Girdwood	AK	99587	US	United States
Cronick	Sarah		1030 P St	Anchorage	AK	99501	US	United States
Long	Karol	4062409303	12912 E 12th Ave	Spokane Valley	WA	99216	US	United States
Watts	David	3236338153	1786 Caribou Way	Fairbanks	AK	99709	US	United States
Lieght	Ptery		812 W 29th PI Apt 16	Anchorage	AK	99503	US	United States
Greene	Jay	9075180534	7304 Linden Dr	Anchorage	AK	99502	US	United States
Willean	Kirstie	9073621229	PO Box 2303	Seward	AK	99664	US	United States
Noblin	Barbara	5129651529	6327 Taylorcrest Dr	Austin	TX	78749	US	United States
Parlato	Nicholas	9073780910	1645 Old Pioneer Way	Fairbanks	AK	99709	US	United States
Kasza	Carol		PO Box 73452	Fairbanks	AK	99707	US	United States
Halloran	Maddie	9079529774	1337 Valarian St	Anchorage	AK	99508	US	United States
Bean	William	9072052361		Anchorage	AK	99504	US	United States
McClellan	Katie		321 Noyes St	Fairbanks	AK	99701	US	United States
Keiner	Alexis Roberts		2001 Churchill Dr	Anchorage	AK	99517	US	United States
			380 E 11th Ave					

Larson	Danna	9075387313	Unit 228	Anchorage	AK	99501	US	United States
Heath	Susan		2552 Mount Vernon St SE	Albany	OR	97322	US	United States
Williams	Sean		231 E Eagle Ave	Palmer	AK	99645	US	United States
Ebbesson	Barbara		3165 Anella Ave	Fairbanks	AK	99709	US	United States
Kun	Shoshana	9075908313	326 Wedgewood Dr Apt E27	Fairbanks	AK	99701	US	United States
Furman	Sarah		PO Box 6	Ester	AK	99725	US	United States
Francis	Teal	5416395464	1740 Reed Cir	Fairbanks	AK	99709	US	United States
Cameron	Casie		2599 18th Ave	Fairbanks	AK	99709	US	United States
Stokes	Jas		PO Box 82138	Fairbanks	AK	99708	US	United States
Stone	Shoshanah	9073606302	2425 Marian Bay Cir	Anchorage	AK	99515	US	United States
Koivisto	Ellen		1556 Great Hwy	San Francisco	CA	94122	US	United States
Cusimano	Lauren	6027430970	1664 Juneau Dr Apt A	Anchorage	AK	99501	US	United States
Nieland	Thomas	2103998338	415 Oakwood Dr	Alamo	TX	78516	US	United States
Meath	Tristyn	9077124762	3410 Eide St Apt 3	Anchorage	AK	99503	US	United States
Bare Grounds	Orion		775 Post St	San Francisco	CA	94109	US	United States
Ryan	Sandra		1407 W 47th Ave Apt 1	Anchorage	AK	99503	US	United States
Genet	Staci		PO Box 296	Talkeetna	AK	99676	US	United States
Plymire	Jim			Homer	AK	99603	US	United States
Hobbs	Lila		2220 N Star St Apt 3	Anchorage	AK	99503	US	United States
Privitera	Nora		3242 Kansas St	Oakland	CA	94602	US	United States
powers	korbyn			Sitkas	AK	99835	US	United States
Mireault	Kathleen		116 E Howard St Apt 221	Quincy	MA	2169	US	United States
Reynolds	Lisa-May	8435251328	26 Honeysuckle Ln	Beaufort	SC	29907	US	United States
Cowen	Anna		19308 Leland Rd	Oregon City	OR	97045	US	United States
piper	janna	5037566822	PO Box 15072	Portland	OR	97293	US	United States
Lapointe	Kenneth		2781 Mozart St	Los Angeles	CA	90031	US	United States
Apone	James	9072581778	PO Box 242213	Anchorage	AK	99524	US	United States
Nieland	Carolyn	2103998338	415 Oakwood Dr	Alamo	TX	78516	US	United States
Willsrud	Susan	9079786900	4780 Old Nenana Hwy	Fairbanks	AK	99709	US	United States
Downey	Deirdre		328 Gold St	Juneau	AK	99801	US	United States
Rivers	Jerry	5166704461	8 Gombert Pl	Roosevelt	NY	11575	US	United States
Kairaiuak	Tava		5246 17th Ave NE	Seattle	WA	98105	US	United States
Carroll	Donna	9074446110	9131 Centennial Cir Apt 201A	Anchorage	AK	99504	US	United States
Plauche	Alaina		1332 Virginia Ct Unit A	Anchorage	AK	99501	US	United States
Bradley	Ellen	4253688916	610 Laurel Dr	Everett	WA	98201	US	United States
ODonnell	Dorothy		4105 Murphy Dome Rd	Fairbanks	AK	99709	US	United States
Cantu	Autumn	9077994487	436 Spence Ave	Fairbanks	AK	99701	US	United States
Stockwell-White	Mary	9077991608	465 W Redoubt Ave	Soldotna	AK	99669	US	United States
Rogers	Julia		2427 Sprucewood St	Anchorage	AK	99508	US	United States
Rukovishnikoff	Faith	9073178716	710 N Yakima St	Wasilla	AK	99654	US	United States
Valentine	Dyana	3106636630	849 11th St Apt 207	Santa Monica	CA	90403	US	United States
Zhao	Jean		1189 Garfield Ave	San Jose	CA	95125	US	United States

Maugherman	Kelly		7623 Old Hickory Ct	Indianapolis	IN	46259	US	United States
Hanson	Kayci		62065 Oil Well Rd	Ninilchik	AK	99639	US	United States
Gluzza	Devon		111 Caroline St Apt 301	Homestead	PA	15120	US	United States
Armand	Daniel	6265519385	26179 SW CANYON CREEK Rd	Wilsonville	OR	97070	US	United States
Rey	John	9095725141	675 Cameo Dr	Colton	CA	92324	US	United States
ramirez	nataly		709 W Ruiseñor Ave	Pharr	TX	78577	US	United States
Torres	Maria	6692381175	2352 W Turney Ave	Phoenix	AZ	85015	US	United States
arin	hannah		4780 W Ann Rd Ste Pm 5	North Las Vegas	NV	89031	US	United States
Joyce	Scott		2029 Sunrise Dr	Anchorage	AK	99508	US	United States
Lakshas	Kylan		3852 Dan Dr	Morristown	TN	37814	US	United States
Springer	Alissa		HC 72 Box 822	Tok	AK	99780	US	United States
Biskup	Toni		7601 Our Own Ln	Anchorage	AK	99516	US	United States
Fontaine-McHendry	RJ			Anchorage	AK	99515	US	United States
Eckel	Teresa			Wasilla	AK	99623	US	United States
Cronick	Sarah		1030 P St	Anchorage	AK	99501	US	United States
Burgess	Natalia	5708782992		Clarks Summit	PA	18411	US	United States
Hale	Tia		17546 Meadow Creek Dr	Eagle River	AK	99577	US	United States
Laurson	Kellie			Talkeetna	AK	99676	US	United States
Ticknor	Tatiana		5310 Larkspur St	Anchorage	AK	99507	US	United States
Wilson	Jenice			San Francisco	CA	94117	US	United States
Morisano	Dominique		37 Mohawk Dr	Collinsville	CT	6019	US	United States
Webber	Storme		PO Box 12924	Seattle	WA	98111	US	United States
Romero	Jasmine		10 Olean Ave	Jersey City	NJ	7304	US	United States
Menka	Nazune			Anchorage	AK	99507	US	United States
russell	W			La Grange	IL	60525	US	United States
Crichton	Savannah		2220 N Star St	Anchorage	AK	99503	US	United States
Snyder	Tom							



Chickaloon Village Traditional Council (Nay'dini'aa Na' Kayax)

VIA EMAIL/MAIL

February 19, 2024

Chief Gary Harrison,
Chairman/Elder

Philip Ling,
Vice-Chair

Cheryl Sherman,
Secretary

Doug Wade,
Treasurer/Elder

Emily Ling,
Member

Samantha Owen
Senior Regulatory Consultant
McMillen Inc.
2607 Western Ave, Unit 360
Seattle, WA 98121
info@eklutnahydro.com

Re: Comments in Support of Eklutna Salmon and a Free-Flowing Eklutna River

To Whom it May Concern,

Chickaloon Native Village (CNV) is a federally recognized Ahtna Dene Tribe in southcentral Alaska, governed by Chickaloon Village Traditional Council (CVTC). CNV's ancestral territory and traditional area of influence include trading trails that span from the Beaufort Sea to the Copper River Delta. This territory also encompasses much of southcentral Alaska, Upper Cook Inlet, the Copper River Region, the Alaska Range, the Matanuska River watershed, and the Susitna River watershed. We acknowledge that this region overlaps neighboring Dene and other Tribal traditional customary use areas, including those of the Native Village of Eklutna. Actions that occur within Dene traditional ancestral territory and customary area of use (as noted above) may impact the environment, Dene cultural resources, and the health of Tribal citizens and community members.

CVTC fully supports the Native Village of Eklutna's vision for Eklutna Watershed:

- The Eklutna River running freely, continuously, and naturally from its glacial headwaters through its dramatic canyon and its productive estuary to the marine waters of Cook Inlet.
- All five species of Pacific salmon (King, sockeye, silver, pink & chum) again swimming freely from Knik Arm through the entire length of the Eklutna River to their spawning grounds at Eklutna Lake.
- An abundant salmon fishery that supports the Eklutna Dena'ina and the people of Southcentral Alaska.
- Eklutna Lake, centerpiece of Chugach State Park, full to its natural lake level to support sockeye salmon shore spawning and human-powered recreation.
- An Eklutna River that rebalances the needs of fish, the Eklutna Dena'ina, drinking water for Anchorage, and low-carbon power production.

CVTC fully supports the comments and position of the Native Village of Eklutna (NVE) as presented in their December 4, 2023 comments on the Chugach Electric Association, Matanuska Electric Association, and Municipality of Anchorage ("Project Owners")'s Eklutna Hydroelectric Project Draft Fish and Wildlife Program ("Draft Program"). NVE's

PO BOX 1105 Chickaloon, Alaska 99674
e-mail: cadmin@chickaloon-nsn.gov

Phone (907) 745-0749 Fax (907) 745-0709
Home Page: <http://www.chickaloon-nsn.gov>

letter clearly presents the biased inadequacies of the Draft Program and CVTC agrees fully with NVE. The Draft Program fails to meet the fundamental purpose of the 1991 Eklutna Fish and Wildlife Agreement.

From page 4 of NVE's December 4, 2023 comments:

NVE's alternative of dam removal within ten years will provide fish passage upstream and downstream to and from the lake and upper tributaries and return the river's natural flow regime that salmon co-evolved to depend upon, restoring the entire river and lake ecosystem. This proposal aligns closely with National Marine Fisheries Service ("NMFS"), US Fish and Wildlife Service ("USFWS"), and other Technical Working Group ("TWG") member's study period preferred alternatives with fish passage to and from the lake and flows that closely mimic the river's historic natural flow regime. The Conservation Fund has pledged to pay all the costs of removing the Eklutna Lake dam.

From page 12 of NVE's December 4, 2023 comments:

The preferred alternative [of the Project Owners] continues to create a dead-end river, with over a mile of dry streambed below the dam. Creating a dead-end river hardly mitigates the damages caused to fish and wildlife from the Project because it prevents connectivity between Knik Arm, the lower Eklutna River, the lake, and the upper tributaries. The preferred alternative cannot mitigate damages to sockeye in any way because it will continue to prevent nearly all anadromous sockeye from spawning in the Eklutna River system. Because the destruction of the sockeye run was the "specific concern" leading to the Agreement, a Program that continues to prevent almost all sockeye from spawning is impermissible. The preferred alternative permits less than 10% of the river to flow down its historic channel to the Knik Arm, the smallest amount of any proposed alternative.

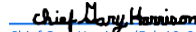
CVTC staff have taken the time to review the Eklutna Fish and Wildlife Program draft, the Cultural Resources Report, and Native Village of Eklutna's (NVE) comments dated December 4, 2023. CVTC fully supports NVE's response to the Draft Program including NVE's Traditional Ecological Knowledge (TEK) that has been ignored throughout the report. CVTC will remind the "Project Owners" that the Indigenous peoples of Alaska are the Original People of the land and understand its ecosystems far longer than Euro-Americans and colonists that have moved in over the last 150 years into the immediate area.

The following concerns regarding the Cultural Resources Report as follows:

- 2.1 Indigenous Occupation: "The United States purchased Alaska from the Russian Empire in 1867." This is technically not correct, by the Doctrine of Discovery and international laws on conquering nations, Russia technically only owned two forts on two different islands within Alaska, they never completely conquered Alaska or all its Indigenous Peoples.
- 5.1 Eklutna Lake Shoreline Survey – report mentions shovel tests were excavated along the lake shore but did not specify the screen mesh size. Was it 1/8" or 1/4"?
- Earliest cultural resources investigations noted in the report are 1983 to 1984, 40 years ago while the Eklutna river and lake had been disturbed with construction in the 1920s with no mention of archaeological survey. The report mentions considerable disturbance and bulldozing throughout construction, land clearing, and redirection of flow. It is likely considerable cultural resources were lost during this time and SOI-Q Archaeological and Tribal monitors should be present for all ground disturbance.

Lastly, the Draft Program assumes that all costs associated with dam modifications and restoration will be borne by the rate payers. This is unnecessary and highly unlikely, especially if there is extensive restoration for fish and wildlife habitats. The Conservation Fund has already (and repeatedly) agreed to fund removal of the Eklutna Lake dam and there are numerous federal grant funding sources available for fish habitat restoration activities. This funding information should be shared publicly and with the governor for more accurate understanding of the costs of the alternatives. CVTC appreciates the opportunity to comment on this biologically and culturally very important project and urges all decision-makers to restore fish passage to Eklutna Lake and the entire Eklutna Watershed.

May Nek'eltaeni (Creator) Guide our Footsteps,


Chief Gary Harrison (Feb 19, 2024 20:39 AKST)

Chief Gary Harrison
Chairman

2024.02.19 CVTC Comment on Eklutna Dam

Final Audit Report

2024-02-20

Created:	2024-02-20
By:	Jessica Winnestaffer (jewinnestaffer@chickaloon-nsn.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAJByaGZGKvypCjJkEww7n2mduJJymtX9U

"2024.02.19 CVTC Comment on Eklutna Dam" History

-  Document created by Jessica Winnestaffer (jewinnestaffer@chickaloon-nsn.gov)
2024-02-20 - 5:28:13 AM GMT
-  Document emailed to Chief Gary Harrison (chiefgaryharrison@chickaloon-nsn.gov) for signature
2024-02-20 - 5:28:16 AM GMT
-  Email viewed by Chief Gary Harrison (chiefgaryharrison@chickaloon-nsn.gov)
2024-02-20 - 5:37:28 AM GMT
-  Document e-signed by Chief Gary Harrison (chiefgaryharrison@chickaloon-nsn.gov)
Signature Date: 2024-02-20 - 5:39:39 AM GMT - Time Source: server
-  Agreement completed.
2024-02-20 - 5:39:39 AM GMT

From: [Christine Wilcox](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Monday, February 19, 2024 1:32:20 PM

I am deeply concerned about Eklutna dam project. I support the removal of the dam in 10 years to allow for renewable sources to come online to replace the dam. For the health of the community and the waterway, this is the healthier and cost effective solution.

Christine Wilcox
10001 Hampton Circle
Anchorage, AK 99507



February 19, 2024

Sent via email

Eklutna Hydro Program Development Team
2607 Western Ave, Unit 360
Seattle, WA 98121

RE: Public comment on the draft Fish and Wildlife Plan

To the Eklutna Hydro Program Development Team:

Cook Inletkeeper is a community-based nonprofit organization formed by concerned Alaskans in 1995 to protect the Cook Inlet watershed and the life it sustains. Please accept these comments on the Eklutna draft Fish and Wildlife Plan on behalf of our organization and its more than 6,000 members and supporters throughout southcentral Alaska. Our concerns in this matter center on people and environmental justice, wild salmon and their habitat, and the critically endangered Cook Inlet beluga whale and its potential for recovery.

We support the people of the Native Village of Eklutna and their desire for wild salmon to thrive once again in the Eklutna River watershed providing for cultural practices and food sovereignty.

The 1991 Purchase Agreement allowed the Eklutna Project Owners to side-step the federal licensing process by FERC, thus official government-to-government consultation with Federally Recognized Tribes was not conducted thirty years ago, or likely any time before that. This injustice must be rectified. The people, who stewarded these lands and waters for thousands of years, must be respected as the priority stakeholders and their wishes and knowledge considered above all others in the selection of a final alternative.

We support removal of the Eklutna Lake Dam because it is the only alternative to meet the purpose of the Purchase Agreement.

The Purchase Agreement requires that the utilities work with key federal agencies to develop a Fish and Wildlife Plan with the purpose of developing and implementing measures to “protect, mitigate damages to, and enhance fish and wildlife (including related spawning grounds and habitat).” We agree with comments submitted by one of the key federal agencies - the U.S. Fish and Wildlife Service - which states that the draft plan does not meet the intent of the purchase

agreement because it does not address fish passage:

“The Program should provide connectivity to the lake, release year-round instream flows sufficient to support salmon spawning and rearing habitats throughout the river corridor, and accommodate periodic high-volume flows that maintain habitat characteristics through a self-sustaining dynamic equilibrium between the hydrograph and natural sediment supply.” (p. 3, [U.S. Fish and Wildlife Service](#) comments)

The inadequacy of the “Selected Alternative – Portal Release Facility” to achieve the intent of the Purchase Agreement should make it a nonresponsive option for the Fish and Wildlife Plan.

In addition to widely-shared concerns about the Selected Alternative providing inadequate stream flows to support downstream habitat, Inletkeeper rejects that three (3) years of winter temperature monitoring is adequate to assess thermal suitability of salmon habitat. With our rapidly changing climate and documented warming freshwater conditions in Cook Inlet salmon streams ([Mauger et al. 2017](#)), year-round monitoring is needed for a bare minimum of five (5) years.

We support removal of the Eklutna Lake Dam to create more foraging opportunities for beluga whales in their critical habitat in upper Cook Inlet.

The majority of the Cook Inlet beluga whale population forages at the mouth of the Eklutna River during the summer. Despite the obvious omission of the impact restored Eklutna salmon runs would have on potential recovery of this critically-endangered species, Inletkeeper requests that this analysis be completed and considered before a final alternative is selected.

We’d like to highlight comments submitted by one of the key federal agencies – NOAA and its National Marine Fisheries Services – regarding the link between beluga recovery and an increase in Eklutna salmon:

Listed as endangered in 2008, the Cook Inlet beluga has experienced continued population decline and range retraction, with the entire population now occurring primarily in the upper and middle Inlet. Pacific salmon are a key prey item for Cook Inlet belugas, and the geographic distribution of the whales is strongly influenced by seasonal fish runs. Knik Arm, into which the Eklutna River flows, is important Cook Inlet beluga whale foraging habitat. In addition, Knik Arm, including the mouth of the Eklutna River, is designated critical habitat for the population. ... Improving fish passage and habitat connectivity, as we recommend here, is anticipated to have beneficial effects to both the Cook Inlet beluga whale and its critical habitat and will support recovery of the population. (p. 6, [NMFS](#) comments)

Conclusion

Inletkeeper wholeheartedly supports renewable energy solutions to our climate and local energy crisis. By removing the Eklutna Lake Dam, the Railbelt will lose 3-4% of its generation capacity; however, this loss can be easily made up by renewable energy project coming online in the near future. We believe the Community Supported Alternative is the solution that is a win for people, a win for salmon, and a win for belugas. We support removing the Eklutna Lake Dam in the next 10 years with great investment by the conservation community and restoring the Eklutna River and its wild salmon populations to benefit the Native Village of Eklutna and all the Alaskans who recreate and enjoy the area.

Thank you for considering these comments,

A handwritten signature in black ink that reads "Sue Mauger". The signature is fluid and cursive, with a large, stylized "S" and "M".

Sue Mauger
Science Director
sue@inletkeeper.org



16515 Centerfield Dr, Ste 201
Eagle River, AK 99577
Phone: 907-696-2828
www.eklutnainc.com

February 19, 2024

Ms. Samantha Owens
McMillen Corp.
2607 Western Ave, Unit 360
Seattle, WA 98121

Re: Public Comment on Eklutna River Fish & Wildlife Program

Dear Eklutna Hydro Project Owners,

The Eklutna, Inc. Board of Directors respectfully submits these comments in response to the draft Eklutna River Fish and Wildlife Program (Program) released October 27, 2023.

I. Introduction

Eklutna, Inc. is an Alaska Native village corporation managing the land and interests of Eklutna shareholders. It is well-known Eklutna, Inc. is the largest private landowner in Anchorage, but Eklutna should also be recognized as one of Anchorage's largest philanthropic organizations. Eklutna, Inc. has endlessly contributed its most precious resources to the development of Anchorage – willingly or not.. At first, the flow of the Eklutna River was dammed in 1928, severing the water and salmon from our people. Then, in 1936, a federally-withdrawn reservation of 328,000 acres was withdrawn for the benefit of Eklutna but was eventually reduced by the US Government to a mere 1,900 acres by the 1950s. Part of these remaining lands housed the Eklutna Vocational School, where Eklutna and other tribes' children were made to assimilate to western culture and forced to cede our cultures. Shortly after the school was closed, the US Army began creating one of Alaska's most heavily contaminated sites at Camp Mohawk inside the Eklutna Village. Around the time the US Army left Eklutna, the Alaska Railroad started mining the granite knobs from which the name 'Eklutna' was derived. These acts perpetrated upon Eklutna are difficult to comprehend now.

Our lands provide many painful reminders of what our people have given to Anchorage's development. However, Eklutna, Inc. has continued to contribute to the growth of Anchorage. Utility lines and roads etched through our land. More than a thousand units of housing built on our lands. Land provided for school sites, airports, municipal purposes, parks, and public safety. Eklutna has long been deeply invested in the prosperity of Anchorage and Alaska as a whole. And now, as one of the state's largest land developers, we recognize the critical intersection between environmental stewardship and economic development. The restoration of the Eklutna River is more than a conservation effort; it is a strategic investment that will protect salmon habitat, boost tourism, elevate recreational activities, and increase property values.

Eklutna, Inc. and its partners took the first step in restoring the Eklutna River by taking down the lower river dam. Now, we urge the Project Owners (Chugach Electric Association, Matanuska Electric Association, and the Municipality), but also the entire Anchorage community, to collaborate in enhancing the draft Program to restore the remainder of the Eklutna River. By doing so, we will shape Anchorage into a city that offers a high quality of life, with the Eklutna River serving as a natural, cultural, and economic centerpiece of the city. Simply put, the AWWU Portal option¹ forwarded by the Project Owners does not achieve those goals for the Eklutna River.

II. NALA, ANCSA, and the Eklutna River

We urge a more thorough examination of the economic impact on landowners, such as our corporation, due to the devaluation of landholdings. Eklutna, Inc. owns nearly all the land on either side of the Eklutna River and around Eklutna Lake. Additionally, the State of Alaska's Public Access Assertion and Defense unit has deemed Eklutna, Inc. as the owner of the riverbed of the Eklutna River. By this assertion, the Eklutna Dam is sitting upon Eklutna, Inc. land. We would then pose the question of whether the Eklutna Dam, on Eklutna, Inc. property, is in trespass. There should be consideration of the legal ramifications of Eklutna, Inc.'s ownership of the riverbed. There is also a need for the Program to account for riparian zone rights with the consideration of the effective regulatory taking of the Eklutna, Inc. land, suppression of economic opportunities on these lands, and the continued destruction of public and subsistence resources. These are "other considerations under State law" that are important to the analysis.

On a related topic, the North Anchorage Land Agreement (NALA), as interpreted by the State of Alaska, prohibits development of Eklutna lands within the Chugach State Park. This prohibition has been in place for over 40 years. NALA is rooted in the conflicts between the Municipality, State of Alaska, and Alaska Railroad as Alaska Native Claims Settlement Act (ANCSA) selections were made. ANCSA lands were selected based on cultural and subsistence values and areas of potential economic value - a vehicle for economic development leading to opportunities and benefits for the shareholders of Eklutna. NALA freezes nearly 40,000 acres of Eklutna, Inc. lands within Chugach State Park from any economic or occupational benefits due to park management restrictions. The combination of NALA lands, lands bordering the Eklutna River, and a dry river bed results in the decimation of economic value for over half of the Eklutna, Inc.'s ANCSA land conveyances with severely diminished subsistence and cultural value. These agreements, where promises to the Eklutna people are broken or where we were not even considered a party, continue to stunt economic growth for Eklutna, Inc. and Municipality. Meanwhile, various public and quasi-public entities have generated hundreds of millions of dollars in revenue from the resources on the lands for the last 30 years.

III. Preserving Indigenous History and Rights

¹ The AWWU Portal is also referred to as the Eklutna River Release Facility option in the Program. This option proposes to draw water from Eklutna Lake to spill 27 to 40 cubic feet per second at river mile 11 through an AWWU facility. This leaves one mile of the Eklutna River dry from the release facility to the Eklutna Dam, thus not connecting Eklutna Lake to the river system.

The historical presence of Eklutna around the Eklutna Lake and subsistence issues must be acknowledged and integrated into the decision-making process. In most documents evaluating project alternatives, the original condition of the environment is considered. We suggest including a detailed accounting of the Eklutna River before the 1928 hydroelectric power project, rooted in tribal ecological knowledge from the records of the Native Village of Eklutna and other available sources. The public deserves to understand better what may be gained through connecting the Eklutna Lake to the Cook Inlet. Currently, the Program advances selective studies dispelling the existence and viability of sockeye in the Eklutna Lake. A fair and balanced document would include the narrative of pre-1928 Eklutna River conditions.

Protection of Native hunting, fishing, and gathering rights is a part of Alaska law and federal law. There was no discussion of subsistence rights and resources in the study. This analysis would be included in a Federal Energy Regulatory Commission re-licensing process. We believe the public would expect a detailed description of subsistence resources along the Eklutna River. Rather than discuss Eklutna River public and subsistence resources, the Program inexplicably assesses the recreational impacts on an artificial fishery – Eklutna Tailrace. Please explain the obligation to mitigate an artificial fishery likely created to substitute for the destruction of the prominent Eklutna River salmon runs less than 10 miles away. We do not understand why that impact is worth considering while the value of subsistence fishing and legal obligations to protect these rights is essentially ignored. Another requirement under State law mostly ignored in the Program.

IV. Energy Considerations

Eklutna, Inc. is situated within the service areas of Matanuska Electric Association (MEA) and Chugach Electric Association (Chugach). Eklutna, Inc. is currently exploring alternative energy projects with both utilities that would augment energy generation from alternative/renewable energy sources. We believe it is worth exploring an option where the Eklutna Dam is removed once adequate renewable energy sources are commissioned to replace the production from the Eklutna Project. With the expansion of the Bradley Lake hydro project in the next decade, it appears adequate replacement renewables are available in the next few years.

The stated need for the continuing existence of the Eklutna Hydro Project is the economic value of damming the River. The Program states the Eklutna Project is the lowest-cost energy source in the MEA and Chugach systems. The Program indicates the electricity is generated at \$85/MWh. Recently, it was reported that the Houston Solar project power was purchased by MEA at \$65/MWh. New power purchase agreements are typically based on the avoided cost of the utilities' portfolio, which is the cost the utilities would have to pay to produce the same power. Chugach Electric's avoided cost is reportedly even lower. A major cost, forwarded by the Project Owners, for dam removal or dam replacement is replacement energy costs – upwards of \$150 million in the next 35 years. The Program predicts replacement electricity rates to reach over \$130/MWh in 24 months and likely escalate sharply from there. We understand solar is an intermittent energy generation source, and a firm power source such as natural gas or hydroelectric is preferred, but we question how the replacement energy is determined based on these numbers as well as the CAPEX costs we will address later in this letter.

We would also note the Eklutna Generation Station (EGS) is rarely operating at full capacity, which would employ all of its 10 gas-powered turbines. It is important to consider the necessity of a 40-MW of hydroelectric generation when the EGS is only fully-employed for a handful of days per year. The EGS provides the same firm power supply as the hydro project for timely dispatch and offsetting renewable energy variability. We understand natural gas supply is reportedly waning, but shortfalls in gas supply cannot be offset by Eklutna Hydro. Thus, what is the “utility” of this hydropower resource when there is gas plant eight times its size nearby, providing firm power, needed for a handful of days per year, which dwarfs power to be dispatched from Eklutna Power Plant. When utilities are actively lobbying against Renewable Portfolio Standards, is it really the clean, firm power that is desired or maintaining the low-cost status quo at the expense of another resources?

The Eklutna people had their lands and resources diverted to Anchorage public water usage and electricity generation for the Eklutna Generation Station (ESG) and the Eklutna Dam. We understand the competition between Eklutna, Inc.’s needs and those of the utilities bringing power and water to our community. However, the Eklutna, Inc. board of directors demands a better approach to balance these needs, namely a means of fish passage to Eklutna Lake and more in-stream to the Eklutna River.

V. Corporate and Government Accountability

The Program outlines the remaining process for public review and the Governor’s decision on the final Program. The utility-driven public process is closing, but the Governor’s Public Interest Determination (Determination) process is not well defined. The Program alludes to the Alaska Energy Authority leading the State evaluation process; however, that agency would be an unlikely candidate for executing a public process and delivering a fair decision on the Governor’s behalf. We request greater clarity on which department or division within the State of Alaska will be responsible for the State’s public process leading to the Governor’s Determination decision. Additionally, we request a meeting with the Governor and the state officials directing the public process to express our further position.

VI. Economic Analysis and Utility Revenue

We appreciate the Program recognizing Eklutna, Inc.’s contributions to the CAPEX for the dam replacement options. During the public meetings in January, McMillen consultants were unable to articulate how CAPEX figures for dam replacement ranged from \$118-170 million when Eklutna, Inc. determined the cost of dam replacement would be closer to \$57 million or lower.² The inflated CAPEX has been a driver for the Project Owners to promote the AWWU Portal option, disillusion rate payers, and deny options to meaningfully mitigate damages and enhance fish and wildlife habitat.

The Project Owners have had since 1997 to plan for enhancement and mitigation of the Eklutna Dam’s deleterious impacts upon fish and wildlife habitat on and along Eklutna River. The Eklutna Dam was sold to the utilities, heavily discounted, in a private sale complete with a FERC

² McMillen asked Eklutna, Inc. for cost estimates advice due to our team’s experience in construction and land development.

licensing workaround. Even with that head start, the Project Owners fail to save or plan for the future of the Eklutna River. The result of this level of myopia in the corporate world often results in bankruptcy or plummeting stock prices. Here, the lack of planning and foresight results in the Project Owners advancing the lowest cost and lowest benefit approach to compensate for more than 30 years of neglecting their responsibilities while the Eklutna and ratepayers cover the costs.

VII. Eklutna River Public Access

We would like to note there is public access to the Eklutna River through the Eklutna, Inc. permit system. Historically, we have provided free public access to our lands. Page 58 of the Program incorrectly states there is currently no public access to the Eklutna River that would prohibit new recreational opportunities for fish returning to the Eklutna River. The Project Owners were corrected several times in meetings that Eklutna lands are accessible to the public. With statements like this still included in the Program, it just goes to show the lack of rigor and attention to detail in this process.

VIII. Inadequate Alternative Analysis

We are also disappointed, yet unsurprised, by the option selected by the Project Owners; however, we are more disappointed with the analysis in the draft document. It is extremely unusual for a preferred option to be advanced in a preliminary plan without fully evaluating each viable option for the public's review. Typically, in a planning or project document, a suite of 3-4 options is identified, and each option is discussed and evaluated through a series of criteria, on a point-by-point basis, leaving the public with an opportunity to review the case for each option. Options forwarded by the federal agencies and the Native Village of Eklutna were not thoroughly evaluated under the same criteria the Portal option was given. Thus, the public reviewing the Program only received a serving of the benefits on the AWWU Portal while the other options were summarily dismissed. This is not dissimilar from the eight public meetings where a representative of the Project Owners focused on the merits of the preferred alternative while deriding the other options. For the Program to be legally-defensible, a full evaluation of each option – now including dam removal – should be included in the Program. By only forwarding analysis of the AWWU Portal option, it is our belief the Program is ripe for legal challenge as it rendered this multi-year planning process moot by not explaining each viable option and explaining the reasons for a preferred alternative based on a critical, purposeful evaluation of what the Agreement parties and working groups advanced to Project Owners.

IX. Request for Eklutna River

Six years ago, Eklutna, Inc. and partners removed the lower Eklutna Dam – an artifact of an initial violation of rights of the Eklutna people. Eklutna, Inc. and the Native Village of Eklutna have worked with US Environmental Protection Agency and US Army Corps of Engineers to remediate the Camp Mohawk contamination. The Alaska Railroad stopped mining the Eklutna Knobs and returned the land to Eklutna where we host youth cultural camps and pow-wows for the general public. The need to reconcile past harms have been recognized and addressed by

most public entities. Now, this is the time for the Project Owners to meet the intent of the 1991 Agreement's obligation and invest in our community's future.

The Eklutna, Inc. Board of Directors strongly urge the Project Owners to prioritize the concerns raised in our comments and work collaboratively with us towards solutions that ensure the sustainable development and preservation of the Eklutna River ecosystem. A solution where the Eklutna River is fully-connected from the Eklutna Lake to the Knik Arm/Cook Inlet is our desired outcome. If additional time is needed to continue negotiations and evaluations on how to reach the desired outcome, we support delaying finalization of the Program and delivery to the Governor for up to three years to ensure the outcome is sensible for our community.

In order to further outline our position on the future of the Eklutna River, we welcome the opportunity to meet with the Project Owners. Please feel free to contact the Eklutna, Inc. CEO, Kyle Foster, at 907-696-2828 or kfoster@eklutnainc.com.

Sincerely,

A handwritten signature in black ink, reading "Michael Curry". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Curry
Board Chair and President

CC: Governor Michael J. Dunleavy
Mayor David Bronson
Christopher Constant, Anchorage Assembly Chair
Aaron Leggett, Native Village of Eklutna
Sarah Lukin, Cook Inlet Region, Inc.
Tony Izzo, Matanuska Electric Association
Arthur Miller, Chugach Electric Association

From: [Friends of Fish Creek](#)
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Project Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 1:20:29 PM

19 February 2024

To: Eklutna Hydroelectric Project Team

From: Friends of Fish Creek

RE: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

Friends of Fish Creek (FOFC) is an Anchorage-based non-profit with the mission to daylight (restore underground waters of the creek to the surface) and rehabilitate the creek, making it possible for Coho to once again inhabit and spawn in its waters.

We wholeheartedly celebrated the removal of the lower Eklutna dam, accomplished by a partnership of the Native Village of Eklutna and environmental NGOs. It was one step forward in restoring Eklutna River, which has been dammed for 100 years, to the detriment of traditional salmon runs and Eklutna's Dena'ina peoples.

As well, we wholeheartedly support the removal of the upper Eklutna dam and the restoration of its waters, which will have the beneficial effect of welcoming the river's salmon home. We believe dam removal to be the legal obligation of the Utility in order to mitigate the project's negative impacts to fish and wildlife.

The Utility's proposed plan fails to consider removal of the upper dam, which constitutes a fundamental flaw in the plan. As such, FOFC is encouraged by the unanimous resolution passed by the Anchorage Assembly on 2 February of this year to pause the plan for two years in order to address this.

The current proposal will also leave one mile of river without water and releases only 3-4 percent of historic flow, without which, fish passage is impossible without additional infrastructure, such as fish ladders.

Current electrical output is minimal from the dam and can be reasonably replaced by renewables like wind and solar within a decade.

Without dam removal, fully connecting the river and returning water flow, negative impacts to fish will remain and obligations set forth in a 1991 agreement between the Native Village of Eklutna, the State of Alaska, the hydroelectric project owners, and the federal government to address the environmental damage will go unfulfilled.

For these reasons, we stand with the Native Village of Eklutna, the Anchorage Assembly, and the environmental groups who want to see removal of the upper dam. Further, because the proposed plan fails to consider dam removal, we also support a two-year pause and reset.

Thank you for the opportunity to comment on this important issue.

Respectfully,

Karen Button, board president

--

Friends of Fish Creek

www.daylightfishcreek.org

www.facebook.com/salmoninspenard

--

Ch'atanaltsegh / ƛiq'aka Betnu (Fish Creek)

flows through Dena'ina Ełnena (Dena'ina homelands)



KENAITZE INDIAN TRIBE

www.kenaitze.org

P.O. Box 988 • Kenai, AK 99611 | Phone: 907-335-7200 • FAX: 855-335-8865

Samantha Owen
Senior Regulatory Consultant
McMillen Inc.
2607 Western Ave, Unit 360
Seattle, WA 98121

Re: Eklutna Hydroelectric Project Draft Fish and Wildlife Program

I write today on behalf of the Kenaitze Indian Tribe, a federally recognized Tribal government with operations within view of the mouth of the Kenai River, in Old Town Kenai, Alaska, one of the most productive salmon producing rivers in the state. We call ourselves the Kahtnuht'ana Dena'ina – the Kenai River people – to recognize the source of the salmon that have nourished our bodies, minds and souls since time immemorial. Today, the Tribe has more than 2,000 members and provides services to about 8,000 Alaska Native and American Indian people. Our traditional lands are bordered by those of the Ninilchik Village Tribe to the south and the Native Village of Eklutna to the north.

It is with the traditional Dena'ina Value of Nagh'utdalts'ina – “respect for our neighbors and others” – that the Kenaitze Indian Tribe supports the removal of the Eklutna dam and restoration of the Eklutna River. Our Tribe specifically supports the Native Village of Eklutna (NVE) Eklutna River Restoration goals, as stated in NVE Resolution 2022 – 4; “Łiq’a nagh qinqtudeł - We are hopeful the salmon will return to us.” These goals include “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.” The Kenaitze Indian Tribe also supports the earlier comments submitted by NVE, the National Tribal Water Coalition, and other Alaska Native Tribes.

Our Tribe is fortunate to live near a huge flowing river that the salmon return to each summer, as they have for multitudes of generations. As a result, our members can use traditional methods to harvest fish, to stock their freezers with subsistence foods, and to share their cultural way with the next generation. Unfortunately, our sisters at NVE do not have that same ability, and the plan put forward by the electric utilities will not change that. Instead, the utilities’ preferred option would leave a mostly dry river for nearly a mile between the Anchorage water supply pipe and Eklutna Lake. This alternative is insufficient to restore historic salmon habitat, including the main channel, side channels, and off channel habitat, which studies have shown still provide abundant potential sockeye spawning habitat if only there was water flowing through them. Moreover, fish could still not pass to sockeye habitat in Eklutna Lake and chinook and coho habitat in the Lake tributaries. This

alternative would not restore historic wrongs and it ignores the advice, options, and requests of NVE and other groups.

We ask that you adopt NVE's proposed alternative to remove the dam and restore the Eklutna River flow for the entire length of the river. This alternative would still allow water to be used for the City of Anchorage and for some power generation, but also allow the Tribal community to return to its traditional ways on its traditional lands.

Duk'idli, respectfully,



Chelsea Hendriks
Interim Executive Director
Kenaitze Indian Tribe

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Lizzy Dean](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 11:57:13 PM

To the Owners of the Eklutna Hydroelectric Project,

This comment is in regard to the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River. I do not believe that the plan's proposal to utilize the existing Anchorage Water and Wastewater Utility (AWWU) water supply infrastructure meets the needs of salmon, the vision of the Native Village of Eklutna, or your legal obligation to mitigate the project's impact on fish and wildlife. I support the Native Village of Eklutna's vision for river restoration and ask you to consider dam removal or another alternative that will fully reconnect the river and return the water flows needed to support the river's fisheries. As an Anchorage resident, utility payer, and water drinker, this is also my vision - undoing the damage caused by this project in the first place and restoring the Eklutna River and its salmon runs.

The current proposal leaves a mile of the river dry, releases only 3% of historical flows, and does not provide fish passage into the lake and upstream habitat. Salmon populations will only recover with a reliable and consistent water supply and access to crucial upstream spawning and rearing areas. This proposal is unacceptable and needs to go further to restore the river's salmon runs. I attended one of the public comment meetings in Anchorage in January and spoke with you - the project Owners. You stated that your main concern for increasing flows to the river beyond what is in the draft proposal is the threat of erosion to pipe infrastructure underneath the river channel. When I asked you for specifics about this, you could not provide details on how various flow rates might affect the pipe infrastructure. You also could not provide information on any studies that you undertook to understand engineering or other solutions that might mitigate this risk of erosion while returning life-sustaining flows to the river. Given the mandate of the 1991 Fish and Wildlife Agreement, these are unsatisfactory answers and I implore you to do more research before making such an impactful decision.

I do not believe that the draft proposal and studies included by the out-of-state consultant took into account sufficient data and knowledge from the Native Village of Eklutna. When I asked one consultant about their process for understanding pre-dam salmon levels in the river, they gave many reasons why this number is so difficult to quantify and then outlined their process of sampling the lake, which gave them a range of population numbers. When I asked if they talked to the people with knowledge and experience fishing that river before the dam went in, they acknowledged that oral histories tell them that there were abundant salmon runs in the river before the dam. And yet the cost-benefit calculations throughout the report leave out this critical piece - the impact of this dam on a generation of salmon runs and a generation of people. The calculations do not include the enormous cultural, social, nutritional, environmental, and economic loss that this dam inflicted. When I asked the consultant if she thought that this was a problem, she sort of cryptically but also very tellingly told me that I was asking the right questions. The draft proposal for the Eklutna River minimizes the concerns, vision, and voice of the Eklutna people. It also minimizes the voices of all of us interested in a balanced solution - one that provides clean water, a restored ecosystem with salmon runs, and a future of renewable energy. I believe that we can do better than this proposal to strike that balance.

The Native Village of Eklutna has communicated its vision for thriving wild salmon in the Eklutna River. Dam removal looks to be the most effective way to achieve this important goal. I understand the reliance on this hydroelectric energy source in the near term. That said, I believe that the numbers were misrepresented in the public meetings - the power coming from the hydroelectric dam as a percentage of renewables is just 2 - 3% of the electricity on the grid as a whole. I support the plan to remove the dam within the next decade when replacement renewable energy is expected to be available. We cannot continue to rely on a system that is inflicting harm and pretend that it is without consequence. Can you imagine if there was a proposal, in 2024, to dam the Kenai River for hydroelectric power, eliminating the sport and subsistence fisheries there? It would never happen. This is a once in a generation opportunity to come together with a bold, forward-thinking, responsible vision to restore a cherished and beloved river system and mitigate the harm caused to its people, its salmon, and its ecosystem. It is a once in a generation opportunity to work hand-in-hand, and in good faith, with the Native Village of Eklutna. I urge you to reconsider the draft proposal which disappointingly fails to prioritize salmon return or the voice of the Native

Village of Eklutna.

Thank you for considering this comment.

From: [Mary Langdon](#)
To: [Sam Owen](#)
Subject: public comment on hydro project
Date: Thursday, February 15, 2024 6:19:55 PM

I am writing in strong support of returning the Eklutna River to its original free-running state, from the lake to the inlet, as per the vision of the Native Village of Eklutna's proposal. I have reviewed the Eklutna Hydroelectric Project Draft Summary of Study Results, US Fish and Wildlife Service comments on the same, as well as the Native Village of Eklutna's vision and proposal per their 4 December 2023 letter to Samantha Owen. I was not able to attend any of the public presentations, though my sister was able to and gave me feedback.

By way of background, my family came to Alaska pre-statehood, and my husband and I maintain a home in Anchorage.

I understand the Assembly has requested a two year extension on the project plan process. I sincerely hope this is granted; and, if granted, there is an on-going communication with the public about this process.

I agree with Assemblyman, Kevin Cross' statement (from APM article dated 6 FEB 2024): "If you're a small, limited government human being like I am, then you should be very concerned and angry about what we did to Native Village of Eklutna – just, honestly," he said. "Now, we've been very blessed and we've benefited from it ever since. Anchorage has benefitted wildly from the wrongs we have created. It's not a justification for why we can't move forward."

There's far too little of his thinking in government agencies and elected officials. I believe moving forward means returning the river back to its original state.

~Mary LANGDON

Sent with [Proton Mail](#) secure email.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Mei Mei Evans](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 10:08:07 PM

Re-Wild the river! Bring back the salmon!

From: [Nelli Williams](#)
To: [Sam Owen](#)
Subject: Eklutna comment
Date: Monday, February 19, 2024 9:57:47 PM

I live in Anchorage and am a Chugach Electric Association rate payer. Our family are avid outdoor adventurers, anglers, and hikers and the Eklutna area is one of our favorite places to play within an easy drive of Anchorage.

I have been following this issue closely for many years and am disappointed in the owner's draft fish and wildlife program. It doesn't meet the terms they agreed to in 1991, and spends millions of dollars without meaningfully helping salmon, an important local river and many, many families.

There has been a lot of scientific input that has been ignored thus far. I encourage the owners to go back to the drawing board and put for a plan that's based on science, upholds the vision of NVE and makes a meaningful attempt to bring back the salmon runs that have been severely impacted by this project.

We have a once in a generation to restore a river that all Alaskans can be proud of...right now we are simply heading down a path to throw good money after a bad, inadequate idea (the AWUU portal option).

I support the idea that NVE, TU others have brought forward - removing the dam. While there are still questions that need to be answered, there have been numerous successful dam removal projects all over the country. While complex, dam removal is doable and likely our strongest return on investment. Removing the dam is also very likely the most cost effective with the community partners that have stepped forward to help with that effort. The utilities current proposal is a short cut to a dead river, continues to short-change the Native village of Eklutna, and doesn't make a whole lot of economic or logistical sense. Let's work on a creative forward-looking solution that gets us to the salmon-filled future that Alaskans want. We can do better.

Sincerely,

Nelli Williams

Anchorage, AK

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Paula Davis](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 9:17:14 PM

i support the restoration of the eklutna river. I think the Native community should have a big say in the process & restoration of salmon, as should the Assembly, whose constituents get water from there. i support a community proposal, not the proposal submitted by the utilities.

Thanks,

Paula

From: [Pico Alaska](#)
To: [Sam Owen](#)
Subject: Remarks opposing draft, "portal-valve" proposal for Eklutna Hydro project
Date: Monday, February 19, 2024 3:20:58 PM

To Those It Concerns —

I am writing to comment on the draft proposal by several utilities & agencies for partial restoration of the Eklutna River.

I oppose the current draft proposal and instead support full restoration of the river, which includes removal of the dam at the lake outlet. This alternative is supported also by the Native Village of Eklutna and the Anchorage Assembly.

The citizens of Anchorage, including the village of Eklutna, have a precious opportunity to reverse the damage done to the river and the fish it supports, and we should take full advantage of it. The concept of “rewilding” — returning some segments of our physical environment, of the land we live on, to a state approximating what it was before industrialization and development — should guide our social-economic decisions whenever possible, and restoration of the Eklutna river and the salmon it once supported is a perfect example of the right project, in the right place, at the right time.

The effects of such a change can be mitigated over the next decade:

- additional support structures and/or reinforcement can be added to existing road and rail bridges over the Eklutna River;
- piping for city drinking water can be protected and/or enhanced;
- the loss of electrical power, while of concern, can be made up through continuing energy-conservation measures and additional renewable-energy projects (more wind turbines, for example) throughout the Municipality and beyond.

It is understandable that the electrical-power utilities involved in the Eklutna hydropower project wish to preserve the one-mile stretch of the river directly below the dam. I respect their views and motivations. But the spirit of the 1991 agreement goes beyond its direct call for mitigation of damages and some enhancement of the river and requires restoration in full. Let’s do it.

(Because a wrinkle in this process has been created by a secretive pact between the electric utilities and the Anchorage Water & Wastewater Utility to bind the parties to the “portal valve” proposal, my comment here and those of many others may be rendered moot. It’s impossible for us to know, at least as of now. Nevertheless, I wish my view of this matter and support for the Eklutna River’s full restoration to be recognized as strongly felt opposition to the secret agreement and the draft proposal.)

Thank you.

Peter Porco
3620 Clay Products Drive
Anchorage AK 99517-1007

1.907.306.9659

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Ruth Wood](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 12:35:55 PM

I haven't lived in Anchorage for many years, but I still live in southcentral alaska (talkeetna,) and i know how fortunate we are to have an opportunity to remove the dam and restore water to the eklutna river. In fact, I thought the decision had already been made to do so. one of the problems with dams is that they reduce or completely eliminate water from the river and, if water is released, temperatures are radically different than natural temperatures. It was my understanding that removing the dam was going to happen and that The conservation fund and trout unlimited would fund the removal. i fully support complete removal of the dam in a timely fashion. I've heard a 10 year time-line, and while not ideal for the fish and wildlife, it would give the project members time to plan and implement other projects. In the meantime, it is imperative to choose an alternative that provides enough water be released that water will flow all the way to knik arm as soon as possible. A true eklutna fish & wildlife program will meet these objectives.

From: [Sarah Histan](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 10:14:21 PM

Hello!

I am an Anchorage resident and Chugach Ratepayer.

I am writing in support of the Community Alternative plan as proposed by the Native Village of Eklutna.

The current plan ([Draft Fish and Wildlife Program](#)) would create a dead-end river, provide just a trickle of water, leave a mile of dry river, prevent salmon from reaching Eklutna Lake, and jeopardize the Anchorage drinking water system. The operators are legally required to make up for the damage caused by their hydroproject, but their plan doesn't do the job.

Instead, please consider the [Community Alternative](#). I am in full support of this plan and know of many others in the local community who are as well.

Thank you for your attention,

Sarah Mehl Histan
Anchorage, AK

From: [Stephanie Quinn-Davidson](#)
To: [Sam Owen](#)
Cc: [samc@chugachboard.com](#); [sisic@chugachboard.com](#); [rachelm@chugachboard.com](#); [Susanne Fleek-Green](#); [bettinac@chugachboard.com](#); [markw@chugachboard.com](#); [Jimn@chugachboard.com](#)
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,
Dr. Stephanie Quinn-Davidson, Ph.D.
Fisheries scientist
Restoration Policy Manager, Ridges to Ripples Indigenous Conservation Group

--

Stephanie Quinn-Davidson (she/her/hers)
Anchorage, Alaska
stephqd@gmail.com
507.491.6607

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Ted Eischeid](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 10:13:46 PM

Hello,

I'm writing to submit my opposition to the utilities' recommended option called the "portal valve alternative". This option has some unknown impacts on anchorage's drinking water system, plus it has know impacts on preventing salmon access to eklutna lake and its tributaries.

I much prefer the alternative suggested by the native village of eklutna and others that recommend full eklutna dam removal in 10 years or so once other energy sources come online to replace some of the loss of hydroelectric generation. Its a conservative proposal that addresses most concerns.

I remember when utilities proposed a hydro electric project on the snow river in the kenai peninsula a few years back. The public response was clear: we didnt want to SACRIFICE a salmon fishery for electricity. I believe the same applies to eklutna.

Additionally, many groups have worked to open up and enhance salmon habitat in upper cook inlet, including the Mat-su Bourough (fish passage culvert program), mat-subasin salmon habitat partnership, and the Mat-su fish and wildlife commission as a small sample. The portal valve alternative counteracts all these efforts, the NVE proposal doesnt.

Finally, as a fisher and recreational user of eklutna lake, i want to see a restoration of this ecological system to what it was. Additionally, with the closed door negotiations the utilities have done with the A.W.W.U. I dont exactly trust my utility these days. If it quacks like a duck...

I oppose the portal valve alternative for these reasons, and suggest you forward the native village of eklutna proposal and restore the full length of the eklutna river by removing the eklutna lake dam and allow full access to the eklutna lake and tributories to anadromous fish.

Please make my comments part of the public record. Thank you.

Ted Eischeid
410 Mellow Pl
Anchorage ak 99508

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Valeria foster](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 5:51:40 PM

To the Esteemed Officials and Stakeholders,

I am reaching out to articulate my profound reservations regarding the "AWWU Portal" initiative proposed by The Owners. This plan, targeting the mitigation of the Eklutna River, starkly misses the mark in addressing the essential ecological requirements of the river and its historic salmon populations. The Eklutna River, with its legacy of supporting all five species of salmon, is a jewel in our ecological and cultural landscape, a fact that the proposed project fails to honor adequately.

The foundation of the 1991 agreement was to ensure the preservation and restoration of the Eklutna River's ecosystem to a state as close to its original condition as feasibly possible. However, the AWWU Portal proposal diverges alarmingly from this foundational goal, presenting a path that risks the ecological integrity and the rich cultural history tied to the river. Ignoring the critical need for a diverse and thriving salmon population in the river does a disservice not only to the ecosystem but to our community's heritage and future.

Understanding the species composition of the Eklutna River before its alteration poses challenges, yet the oral histories and traditions passed down from our indigenous communities offer a rich tapestry of knowledge. These stories are not mere anecdotes; they are testaments to the river's historical biodiversity and a guide to what restoration should aim to achieve.

The necessity of a vibrant river ecosystem, particularly for sockeye salmon fishing near Anchorage, cannot be overstated. The Kenai River serves as a testament to the socio-economic benefits of such ecosystems, showcasing the potential for Anchorage to harness similar benefits. A revitalized Eklutna River would not only enrich our community with natural beauty and recreational opportunities but would also serve as a crucial economic asset, much like its counterpart.

While I recognize the utility's objective to maintain affordable rates, it is crucial to embrace a broader vision—one that considers the paramount importance of sustaining our environment and, by extension, the Anchorage and Alaskan economy. This vision requires a commitment to solutions that foster all aspects of our community's well-being, from ecological health to economic vitality.

Moreover, the opportunity to leverage federal grant funds for this project should not be overlooked. Numerous federal initiatives aimed at environmental restoration and sustainable infrastructure offer financial resources that could mitigate the costs associated with more comprehensive and ecologically sound mitigation strategies. Investing in such solutions would not only align with the original goals of the 1991 agreement but also stimulate our local economy through job creation and long-term economic benefits.

In conclusion, the AWWU Portal proposal is insufficient for the monumental task of restoring the Eklutna River to its rightful state. I strongly advocate for a reconsideration of this approach in favor of a strategy that fully embraces the return and prosperity of all five salmon species. Such a strategy should honor our indigenous heritage, contribute positively to our economy, and seize the potential for federal funding to support these endeavors.

Let us choose a path that reflects a deep commitment to our environment, our economy, and our community's future. I urge you to seek an alternative that aligns with the profound spirit of the 1991 agreement and the collective aspirations of our community.

Thank you for considering this critical matter. I am eager to see how our collective efforts can lead to a sustainable and flourishing future for the Eklutna River and our community at large.

Warmest regards,

Valeria Foster

B-6. Against Dam Removal

This page intentionally left blank.

From: [Randy Brown](#)
To: [Sam Owen](#)
Subject: Keep the Damn Dam
Date: Thursday, November 2, 2023 8:13:23 AM

Good morning and thank you for taking the time to review my comment. I am a voting Chugach Electric member and homeowner in Anchorage.

With dwindling natural gas supplies, rising electricity costs, a warming planet, and hundreds of undammed rivers across this state, it's incredulous to me to think that we're seriously considering removing a reliable source of renewable energy from our electricity portfolio.

I generally support the Anchorage Assembly, but do not on this topic. I grew up in Washington State which has 80%+ of its power coming from renewable energy AND has some of the lowest power costs in the nation. It is because of its hydroelectric resources that it can accomplish is.

Furthermore, the Municipality has a Climate Action Plan that has been sitting on a shelf, collecting dust, not being acted on or taken seriously while the Assembly and Mayor squabble over homelessness. I find it offensive that our "progressive" elected leadership is taking time and effort to weigh in on this issue without offering any reasonable alternatives AND acting upon them.

It feels to me like this yet another example of "playing politics." Let's return the salmon to the stream without removing the dam. Let's build more dams that do not block salmon runs. And let's quit burning fossil fuels. Real leadership would accomplish this.

-Randy Brown
Fairview Resident

[Sent from Yahoo Mail for iPhone](#)

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Manda Gershon](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, December 21, 2023 3:36:20 PM

CAUTION: This email was received from an external source

TO DEPRIVE aLASKANS OF POWER WHILE WE'RE ALREADY STRUGGLING FOR ENERGY IS
OUTRAGEOUS AND COULD LEAD TO DEATH FOR PEOPLE. IS THIS REALLY WHAT EKLUTNA
WANTS TO BE KNOWN FOR?

From: [Morgan](#)
To: [Sam Owen](#)
Subject: Eklutna lake damn
Date: Monday, January 8, 2024 10:25:00 PM

I am in strong opposition of the proposal to remove the eklutna damn as it will impact both awwu and chugach electric.

From: [Mary Tullius](#)
To: [Sam Owen](#)
Subject: Leave the Eklutna dam as it is
Date: Wednesday, January 10, 2024 11:01:27 AM

Please leave the Ekluta dam as it is. The electric co-op utilities have/are spending millions of dollars enhancing water flow in the river at the expense of cheap electricity and drinking water for Anchorage. Do not give away this fossil fuel free, power on demand, environmental friendly part of our electric grid. The utilities recently received a 50 year extension to their permit from the federal government.

This is a valuable asset owned by all the co-op electric utility members in the rail belt area and it is the cheapest supply of electricity in the rail belt area. Do not trade it for the several hundred fishermen who might catch a fish in this river. There should be a cost analysis for dollars to remove and energy lost versus each fish that could be caught.

The governor has committed to Alaska to have 50% non fossil fuel free electrical grid by 2050 This asset is already constructed and upgraded and will cost millions of dollars to remove. Lets evaluate dam removal the next time the dam is up for permit renewal.

What's next? Remove dams at Bradley Lake and the dams in Southeast Alaska?

Michael and Mary Tullius
1334 N Street
Anchorage 99501

Sent from my iPad

From: [Tim Deal](#)
To: [Sam Owen](#)
Subject: Eklutna Lake
Date: Wednesday, January 10, 2024 8:39:45 AM

Morning,

I am staunchly opposed to removing the dam. This reservoir is perfect as a source of water and power generation.

Tim Deal
Anchorage

Sent from my iPad

From: [Jack Freeman](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 3:15:37 PM

CAUTION: This email was received from an external source

Leave the dam alone. It will cost All residents to much money in the electricity and water that would have to be replaced. Our taxes are already to high.

From: [Craig](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 11:54:57 AM

CAUTION: This email was received from an external source

I have two CONCERNS ABOUT REMOVING THE HYDRO DAM. THE FIRST IS THAT MOST OF THE DRINKING WATER FOR ANCHORAGE COMES FROM EKLUTNA LAKE. HOW IS THAT GOING TO BE ADDRESSED?

THE SECOND ISSUE IS THAT HYDRO IS A CHEAP GREEN ENERGY SOURCE. WE GET A TREMENDOUS AMOUNT OF CLEAN POWER FROM THE HYDRO DAM. WE SHOULD BE ADDING TO CLEAN ENERGY POWER, NOT TAKING THEM AWAY.

MY QUESTION IS, HOW MUCH MORE COAL AND GAS WILL NEED TO BE USED TO REPLACE THE CLEAN ENERGY FROM THE HYDRO?

From: [John huschle](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 6:55:39 AM

CAUTION: This email was received from an external source

It seems Dum to my that there is even A convErsation about The eklutna dam. It an IMPORTANT Part of INFRASTRUCTURE especially wi th the dwindling gas su in cook inlet. We n more hydro electricity with all the river in this state It should be our main Source of ELECTRICITY. I say dam up the susitna,moose creek., king river, granite creek, matanuska .

Special interest groups and regulations are killing this c ountry

From: [Keith Sopp](#)
To: [Sam Owen](#)
Subject: Eklutna dam proposal
Date: Saturday, January 13, 2024 10:31:31 AM

I strongly support leaving the dam in place, this benefits most of the people in Anchorage and the rail belt. We have the best drinking water in the country and low cost, renewal power generation. Eklutna is also a wonderful, accessible recreation area. Please do not remove this asset. Thank you, Keith Sopp 99502
Sent from my iPhone

From: [Larry McItosh](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 10:20:32 AM

CAUTION: This email was received from an external source

As a former powerplant/gas handling facility operator for Taps in Valdez, I Encourage both MEA and CEA not to be bullied by the eco terrorist. RENEWABLE energy via wind and solar is a joke. Natural gas is in abundance in Alaska, especially on the north slope, which should be utilized for local power generation. There apparently is the MEA natural gas power plant in Eklutna as well to supply needed power to the valley and Anchorage. Generally, few fish migrate into a glacier fed lake unless there is fresh water sources. Perhaps the eco terrorist prefer to collapse Alaska's economy and reduce population via progressive, unreliable, UNREALISTIC measures?

From: [Mark Gordon](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 13, 2024 8:56:17 PM

CAUTION: This email was received from an external source

Please stop the stupidity. You cannot replace the water to Anchorage without building another dam, and there's no need to end the power generation. Just stop it. dancing to zealots and extremists has to come to an end. end it here, please.

From: [Mike Layman](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 8:35:45 AM

CAUTION: This email was received from an external source

Sometimes things that seemed relevant 30 years ago change! If it's the cheapest power in the rail belt as stated; let common sense prevail and re write or toss out the previous agreement. It will cause a stir that will settle down after a bit and we'll all be winners after that.

You didn't have all the woke crap 30 years ago site that in your brief, as you are surely fighting an uphill battle; unnecessarily!

It's not broke, don't fix it.

From: [Stacey dean](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 9:46:59 AM

CAUTION: This email was received from an external source

We have a huge need for power and water in southcentral alaska. We should not let a tiny group of people dictate what shall happen with our dam. This dam is necessary for energy and fresh water.

From: [Tammie Smith-Scott](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 5:03:01 AM

CAUTION: This email was received from an external source

I have been in Anchorage since 1968. The hydro. Project has been the most stable source of electricity we have. At the time environmental impact statements were done. Due diligence was used. It is as green a project we have ever had. It seems foolish, and not cost effective to remove it. There are fish in the river, I have fished there myself. If additional ladders and such need to be added do so. But we can not afford tearing this down, when it is one of the only consistent and reliable sources of energy we have. It was green before anyone was worried about it. It is counter productive to WASTE funds to remove this dam only to have to build another. If it were damaged that's another issue, but until then, please use common sense and let it remain.

From: [Thomas Martin](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 3:52:32 PM

CAUTION: This email was received from an external source

As a MEA customer, reducing any power generation from eklutna station is inexcusable, clean energy is what we need correct? Then why even consider this. We have plenty of fish habitat all over the state that is not managed effectively. When will the nonsense stop. Really!!!!

From: [W evans](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 11:39:46 AM

CAUTION: This email was received from an external source

Removal of the eklutna dam is asinine and a stupid idea. The cost to benefit ratio of the eklutna damn has and does far OUTWAY any dumb ass idea to remove it.

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email: STUDEFANT@EMAIL.COM
CHUCK KAUCIC / MSB "FATHER OF FISH PASSAGE"; USFWS/AOFC
TRAINED

Write your comments on the Draft Fish and Wildlife Program here:

- 1) IDENTIFY THE LOCATIONS/COST/ENVIRONMENTAL & FISH
PASSAGE BENEFITS OF IMPROVING FISH PASSAGE VIA MINIMIZING
STREAM / TRIB / THUNDERBIRD FALLS & RIVER BLOCKAGES & PHYSICAL
IMPEDIMENTS WITHIN THE H2O SHED;
 - 2) DEMONSTRATE THE NEGATIVE IMPACT VIA COST BENEFIT ANALYSIS
OF REMOVING THE DAM VS THE COSTS ANTICIPATED ^{BE BURNED BY} TO THE USER/
CONSUMER/ROCK PAYER FOR THE: 1) 6% ELECTRIC & 2) 40% WATER
LOSSES (ANTICIPATED TO BE LOST);
 - 3) QUANTIFY THE COST OF ALTERNATIVE, NON-GREEN POWER SOURCES:
COAL & NUCLEAR (EXCLUDING WIND OPTION IN VALLEY) INCLUDE
CAPITAL, OPERATION & MAINTENANCE AS WELL AS SOCIAL COSTS.
 - 4) REMOVAL OF THE DAM WITH ITS ERRONEOUS "LOGIC" WOULD BE
ANALOGOUS TO REMOVING ALL HIGHWAYS & TRANSPORTATION
NETWORKS/SYSTEMS THAT WERE CONSTRUCTED ON & FOLLOWED ABORIGINAL
TRAILS / ROUTES
- *Please note all comments will be published online to www.eklutnahydro.com*
- ☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [Elizabeth samuel](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 16, 2024 11:36:36 AM

CAUTION: This email was received from an external source

I am against removing the Eklutna Hydro plant. Water for Anchorage and cheap clean energy for citizens is essential. Removal of the DAM would also lead to flooding of area surrounding the Eklutna lake, destroying trails and camp areas as well as displacing fish and animals in the local habitat.

**Public Comment Regarding Removal of the Eklutna Hydroelectric & Water Dam
by Fr. Randy Hillman, MEA Member and members of
Valley Anglican Fellowship Church who are also MEA members.**

January 16, 2024

**To: Whom it may concern: Mr. Tony Izzo, MEA CEO,
and other MEA Board Members**

**First, thank you, Mr. Izzo, for allowing the MEA members to express our opinions on the
Removal of Eklutna Hydroelectric and Water Dam (Eklutna Dam) via email,
info@Eklutnahydro.com ,**

**Mr. Izzo and fellow MEA Board members, a long time ago I was in Nuclear Physics and
worked with radioactive materials and NBC warfare in the US Navy. I am also speaking
with input from the church members. That being said, I cannot see how the Removal of
the Eklutna Dam will help improve anything or anyone . To the contrary, the Removal
will also cause more harm to the Environment in many ways; as well as, the discussion on
the replacement of the electric power and a water source to the growing water needs of the
largest city in Alaska, Anchorage.**

Let us discuss the many ways the destruction of the Eklutna Dam harms the Environment.

- 1. Where will MEA and Chugach Electric Association replace this renewable, carbon zero, scalable base load power? The Wind Turbines on Fire Island are not working and are being subsidized by the members at an additional cost for no value. They kill birds! Microreactors (Nuclear) Power plants are not available now and nor will they will be available in the near future. See then Department Of Energy's December 13, 2023, report.**
- 2. The Carbon Dioxide generated from the equipment to remove Eklutna Dam is how much? It's definitely not "Net Zero", as it is now.**
- 3. The Environmental impact from the waste from the removed concrete, which in itself has a great deal of Carbon from the manufacturing to the installation of the Eklutna Dam's concrete.**
- 4. Where will the old removed concrete be placed? Again, Carbon Dioxide will be emitted from the destroyed Eklutna Dam's wasted/old concrete.**
- 5. Are there any material(s) that are Environmental Hazards that you know for a fact are not in Eklutna Dam? If so, what kind of workers Personal Protective Equipment (PPEs) will be used, and what kind of Environment Abatement will be used? Can the people and property be safeguarded from any downwind emissions of Hazardous particulates?**
- 6. Environmental Hazardous waste will be transported to and stored where? What will be the cost now and the cost for future storage?**

Now, let us discuss the Impact on the Loss of a Clean, Renewable, Carbon Zero and Scalable Base Load Electricity on the Mat-Su.

- 1. The Loss of this Clean, Renewable, Carbon Zero and Scalable Base Load Electricity in the Mat-Su will impact Every Citizen (approximately 125,000 people) from Student Education to the Pumping of Water to survive and everywhere in between.**
- 2. The Loss of this Clean, Renewable, Carbon Zero and Scalable Base Load Electricity will impact every Citizen multiple times from the Rising Costs of Electricity that we personally use as well the additional retail costs that will be passed on to the consumers as the cost of doing business.**
- 3. What does the MEA Board have planned to replace the Loss of Eklutna Dam's Electricity when additional Electricity will be needed for the growing Mat-Su area that is Clean, Renewable, Carbon Zero and Scalable Base Load Electricity before Eklutna Dam is removed so there isn't any Electrical Power disruption?**
- 4. As MEA members, how much monetary Refunds should we expect (not in future power credits) from Electric power disruptions as Mat-Su Citizens, Retail Users, Both Routine and Emergency Communications from the Loss of Eklutna Dam's Electric Power?**

In Conclusion

I do not believe this would be in the best interest of any MEA members to Remove the Eklutna Dam. Even though the "Environmentalists" do not consider Dams as a part of Carbon Reduction or Renewable Energy, where it truly is.

However, as a MEA member, I believe that Eklutna Dam should be upgraded so that the Dam could withstand and/or resist an Electromagnetic Pulse (EMP) and be able to have the ability to provide Electrical power within a short time period which may or may not affect National Defense (see Oak Ridge National Laboratories, appendix on HEMP/EMPs & the EMP Commission of Pres. Obama administration). The new modification should include a Fish Ladder for the migration of Fish.

Further, as a MEA member, I recommend that the MEA Board revisit building the Susitna River Dam project because of the ongoing issues in providing Clean, Carbon Zero, Renewable, Scalable Base Load Electric Energy, and designing it also to withstand or be resistant to an HEMP/EMP. The Susitna Dam should include in its design a Fish Ladder for the migration of Fish. The construction of the Susitna Dam would supply around or more than 300 MWs of Electrical Energy depending on what capacity the utility-scale electric power generators are operated.

Respectively Submitted,

Fr Randy Hillman

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Jamie Harris

Write your comments on the Draft Fish and Wildlife Program here:

Removal of Dam Benefits a few at the
expense of all.

I do not Support Removal

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

Taking out The DAM only benifits A tiny
Amount. Leaving The DAM ~~cleanly~~ producing
Relatively clean energy with it compared to
other sources is WAY less destructive is
Benifical to A greater multitude.

Please note all comments will be published online to www.eklutnahydro.com

☒ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [Rick Whitbeck](#)
To: [Sam Owen](#)
Subject: Comments for the record
Date: Tuesday, January 16, 2024 9:42:56 PM
Attachments: [image001.png](#)

Good day,

My name is Rick Whitbeck, and I am a nearly 40-year Alaskan and current Chugach ratepayer. I have thoughts on the proposed alternatives under the draft Fish & Wildlife plan as found on the Eklutna Hydro website.

To expand on those, I've written two opinion pieces that have been recently published. The first is on Must Read Alaska here:

<https://mustreadalaska.com/can-the-eklutna-dam-be-removed/>

And the second in the Anchorage Daily News here:

<https://www.adn.com/opinions/2024/01/14/opinion-keep-the-eklutna-dam-as-it-is/>

I'd ask that both pieces be made part of the record for the purposes of advancing the draft-to-final process for the Fish & Wildlife plan for Eklutna.

Should you need additional information or have questions on my content, please reach out at the contact info found below.

All the best,
Rick Whitbeck



Rick Whitbeck
Alaska State Director
Power The Future
907.313.0639
rwhitbeck@powerthefuture.com

This transmittal may contain confidential information intended solely for the intended addressee. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this communication in error, please notify me immediately at the number or email above, and then immediately delete this message and all attachments. Thank you for your understanding and compliance.

From: [Barbara Derr](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 11:33:18 AM

CAUTION: This email was received from an external source

Please keep the eklutna hydro dam. the area needs the power and water the dam provides.

From: [Daryl](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 8:12:28 AM

CAUTION: This email was received from an external source

I do not support the removal of the dam. It will negatively effect the Eklutna Tailrace Fishery, One of the only handicap accessible Fisheries in the Region. It is an Established Fishery that is heavily used by all members of the public.

To change that to a fishery that is only open to a Select few
is a Travesty in the making.

Please do not allow this to happen.

From: gehollett@everyactioncustom.com on behalf of [Glenn Hollett](#)
To: [Sam Owen](#)
Subject: Hydroelectric is the cleanest energy
Date: Friday, January 19, 2024 7:30:35 PM

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River.
We need more hydroelectric dams. This is the cleanest most dependable renewable energy there is.
Wind and solar are a nasty eye sore to Alaskas great beauty.
We need more hydroelectric across the state.

Sincerely,
Glenn Hollett
North Pole, AK 99705-1145
gehollett@gmail.com

From: [Kathy Erickson](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 7:11:35 PM

CAUTION: This email was received from an external source

As a resident of Anchorage, and a person who values alaskan resources being used in the most efficient way to support the humans living here, i am encouraging you to keep the dam. There is no better use that overrides supporting the residents in the multiple ways that it has meT significant needs of Alaskan citizens.

Thank you for this opportunity to voice my choice in this decision!

Kathy Erickson

Anchorage ak

From: [Mark Johnson](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 10:35:29 AM

CAUTION: This email was received from an external source

To whom it may concern, I am writing in support of preserving the Eklutna Hydroelectric powerplant. Hydro is the only reliable year round renewable power source. I am in favor of the smaller release of water into the eklutna river for the salmon but not if it impacts the hydroelectric and the salmon fishery that is established at the eklutna tailrace. I do support the creation of additional hydroelectric powerplants. there are people saying that the eklutna river fishery could be a world class fishery serving all alaskans. To counter this notion is the fact that there is no infrastructure or parking to support the thousands of people that may or may not fish the eklutna river.

From: [Richard McClure](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 7:50:25 AM

CAUTION: This email was received from an external source

The removal of the eklutna lake dam makes no sense. Currently you have a good king and silver salmon sport fisheries at the eklutna tail race and you want to replace it with a marginal sockeye run that would have to be supported by a hatchery. what clearwater creeks flow into eklutna lake that would support suitable habitat for sockeye to spawn in, bold creek, hardly. Let alone the sterile water of eklutna lake laden with glacial silt where they could not grow to suitable size before they migrate out.

Do not remove the dam, hydropower is our best source of proven clean energy. no co2 emissions.

From: [Wendy Gaydos](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 10:00:18 AM

CAUTION: This email was received from an external source

I am APPOSED to removing the Eklutna dam. it is safe clean electric power we need in Anchorage.

From: [Ryan Kennedy](#)
To: [Sam Owen](#); [Sam Owen](#)
Subject: pulbic comment
Date: Saturday, January 20, 2024 5:33:52 PM

I think the dam should be left in place. Hydro power is the least expensive power there is. And we don't even have to build anything, it's already there. Removing the dam would be the least green thing we could do.

As for concerns about honoring indigenous cultures, we can erect a monument next to it. I recommend a beaver themed monument. Recently there's been little Native monuments erected at Potter Marsh, West Chester lagoon, and Pt. Woronzof. Erect one of those next to the dam and this will suffice in protecting it as a cultural resource.

-Ryan Kennedy

From: [James Cloud](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 9:11:36 AM

CAUTION: This email was received from an external source

I am 46 year Anchorage resident and a 44 year member of Chugach Electric Association, and a user of Chugach State Park at eklutna lake.

I am against removing the Eklutna Dam or increasing the cost to electric and water users. We need more hydro-electric energy projects in Alaska, not less.

From: [John J Gaydos](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 5:05:08 AM

CAUTION: This email was received from an external source

I oppose removing the Eklutna dam, it provides clean electricity.
Thank you,
John J Gaydos

From: [John Hester](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, January 22, 2024 11:45:04 AM

CAUTION: This email was received from an external source

I think the idea of removing a dam that lights up 24,000 houses is absurd
In a time we're told that we are running out of gas it seems to be an irresponsible move to support such a thing

From: [Amy HEnry](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 23, 2024 6:11:16 PM

CAUTION: This email was received from an external source

I support hydro-electric power. i support dams. i support building more dams. i believe hydro power through dams can be done in a thoughtful manner. but tearing down a good dam is neither wise, or thoughtful.

thank you,
amy henry

From: [martha](#)
To: [Sam Owen](#)
Subject: Dam at Eklutna
Date: Tuesday, January 23, 2024 3:00:21 PM

I support leaving the dam in place, in this case. Since 25,000 customers receive cheaper power from it versus millions of dollars to remove it, I say let it stay. Alaska has hundreds of other waterways for salmon to run freely. The removal makes no sense.

I am a 43-year resident of Anchorage, an avid environmentalist, a taxpayer, and a super voter. Make the economically sound choice and leave the Eklutna dam in place to help those who benefit from the power. Lucky us to have this great water from the lake, too.

Martha Jokela
2225 Radiant Cir
Anchorage, AK 99501

From: [Theodore missig](#)
To: [Sam Owen](#)
Subject: Ekutna Hydro
Date: Tuesday, January 23, 2024 10:55:49 AM

Dams are the most efficient and clean way to generate electrical power. We all benefit from this source of energy. Leave the damn as is. There is no shortage of salmon in Alaska! There is only a shortage of COMMON SENSE! Ted Missig

From: [Trigg](#)
To: [Sam Owen](#)
Subject: Dam removal
Date: Wednesday, January 24, 2024 11:36:41 AM

I oppose completely removing the Eklutna Dam. We need the power.
Economically retention works in the long term.
Sent from my iPhone

From: [Thomas J Prunty](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 24, 2024 3:40:49 PM

I have been updating myself on the Eklutna Hydro project by attending one of the public meetinings and browsing the project information on this website. I understand that the current project as it stands provides 90% of the moa's water and 6% of the railbelt power. The two remaining proposals both appear to be not only unnecessary but damaging. The optimistic virtue signaling of removing of the dam is by far the worst and the reduced politically correct version of cutting the electric output to the utilities on the railbelt is not only going to negatively affect the utility consumers but also the tax payers in the moa. To get rid of or reduce the cheapest, and the most acceptable power produced in the rail belt is pandering to the woke and radical left wing of alaska politics.

There is no proof that salmon ever used the Eklutna river or lake outside of the convenient folk lore of the eklunta natives. According the the science associated with the lake, the lake has always had way too high a tribidity to raise fish. This dates back as far as records exist and is present today. Planted fish are starving to death because the lake can not produce enough food for thier survival. This condition will not change no matter what is done with the river. There is currently very little shoreline that would support spawning and little could be added.

In summary, don't fix something that isn't broke. Higher rate base, higher taxes do equate to spending millions of dollars to prove that stocking fish at trailRace is supplying more fishing than the river or lake ever did.

From: [Laura Walter](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 25, 2024 10:35:21 AM

I believe That the Eklutna dam should remain in place and continue to supply Anchorage with water and power. It is considered clean power for over 24,000 residents and supplies 90% of the water for Anchorage use.

Looking at the studies on the fish (pages 32 and 33 of the Eklutna Hydroelectric Project Fish Species Composition and Distribution

Year 2 Study Report Final) it appears that the fish do better where the water is moving slow. They seem to do just fine.

I see no benefit in removing the dam.

From: [Rose Ann Goodman](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 25, 2024 11:17:20 AM

I am very much in favor of retaining the eklutna power plant. It is the most environmentally friendly way to generate electricity and has been working well for a long time. Removing the eklutna dam would affect thousands of people and benefit few. it is doubtful that salmon would return to the river anyhow after this length of time.
Roseann Goodman

From: [Angela Birt](#)
To: [Sam Owen](#)
Subject: Eklutna HydroElectric Project
Date: Thursday, January 25, 2024 10:45:23 PM

I oppose removing the Eklutna Dam and depriving residents of this clean, renewable source of energy to “possibly” bring back a tiny run of fish last seen in 1955. There is no way to know if the fish run can be restored and the loss of this power source is not merited, no matter how good some people “feel” about it. It’s wasting a resource we have for nothing.

Angela G. Birt
Eagle River, AK 99577
Sent from my iPhone

From: [Ann](#)
To: [Sam Owen](#)
Subject: Eklutna Hydro Proposal
Date: Thursday, January 25, 2024 11:12:01 AM

Sent from [Mail](#) for Windows

I am in favor of retaining the power plant at Eklutna. It is the environmental friendly way to get power and has been working well for a long time. Removing the Eklutna dam would affect lots of people and benefit few. It is doubtful that salmon would even return to the river.

From: [Anna Fezatte](#)
To: [Sam Owen](#)
Subject: Eklutna Hydropower
Date: Thursday, January 25, 2024 10:47:39 AM

Never has there been a greater need for carbon free power. The loss of Eklutna Hydropower would impact the power and water utilities. The electric utilities losing the hydropower will need to use more natural gas power, more carbon emissions and greater financial cost. With the increase use of natural gas rates will increase. More power would be required to pump water from the wells needed for Anchorage. Can the water utility wells keep up the increase in demand?

From: [Gil Serrano](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Thursday, January 25, 2024 12:10:37 AM

Destroying that infrastructure is madness.

Gil Serrano.

From: [dglscompbl4](#)
To: [Sam Owen](#)
Subject: Removing hydro dam
Date: Friday, January 26, 2024 11:00:13 AM

Good morning! I am adamantly apposed to the removal of the Eklutna hydroelectric dam. This project defies all common sense! If Cook Inlet natural gas is running out, which i highly doubt. Taking away a clean unlimited source of power like the Eklutna dam is a total contradiction to what more renewable energy sources the state and nation is calling for.

I understand the importance of restoring a healthy salmon run but have other alternatives like installing a fish ladder been examined.

Douglas Campbell.

Sent via the Samsung Galaxy S8+, an AT&T 5G Evolution capable smartphone

From: [Mark worcester](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, January 27, 2024 1:39:38 PM

IT IS RECKLESS TO SUPPORT REMOVAL OF THE DAM AT THE VERY TIME INTENSE EFFORTS ARE BEING UNDERTAKEN TO TRANSITION FROM FOSSIL FUELS TO RENEWABLE RESOURCES FOR ELECTRICAL GENERATION. HYDROPOWER IS THE BEST SOURCE FOR FIRM POWER TO SUPPLY POWER WHEN THE WIND DOES NOT BLOW OR THE SUN DOES NOT SHINE. GIVEN THE HIGH COST OF AND RESISTANCE TO ANY NEW HYDRO OR NUCLEAR, THE HIGH COST AND UNCERTAINTY OF TIDAL GENERATION, and the high cost of battery storage, it is irresponsible to even consider taking the dam out. How much and how would the eklutna hydro project output be replaced? This cost has to be factored into any decision to remove the dam. In ADDITION, DAM REMOVAL WOULD POSE RISKS AND COSTS ON ANCHORAGE'S WATER SUPPLY. FINALLY, I SUSPECT THAT THERE IS CONSIDERABLE UNCERTAINTY ABOUT HOW MUCH, IF ANY, SOCKEY SALMON RUNS WOULD ACTUALLY BE REVITALIZED. I UNDERSTAND THE EMOTIONAL ATTACHMENT to salmon, NATIVE HERITAGE AND NATURAL RIVERS (I am a long-time river runner, love salmon, and appreciate native sentiment), but these factors are SWAMPED by the reasons for keeping the dam.

From: [Tammie Smith-Scott](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 28, 2024 7:09:26 PM

I would like to follow up on comments I made a couple weeks ago. After finding out there were only 70 members of the eklutna tribe, it seems inconceivable to me that removing the dam is not feasible at any level. Eklutna provides most of the water for Anchorage and electricity in a substantially green way. It would be cheaper in the long run to pay a royalty to these 70 folks. As I stated before I have fished the area, and there are fish, but in this case the needs of the many must take precedence. To redesign or replace aspects of this project and tear down the dam is too costly at a time we don't have the funds and cannot afford increased rates. Removing the dam will affect the lake levels as well , our water supply, and the recreational use of the area. Sadly progress and population affect natural habitat, but so has the pipelines and their impact was offset by royalties. I think this would be appropriate for the 70 members in this situation. Anchorage has so many problems power wise, we do not need additional ones and loss of water.

Thank you

From: [kirk.brown](#)
To: [Sam Owen](#)
Subject: Closing the Eklutna Dam
Date: Monday, January 29, 2024 12:26:10 PM

I am strongly apposed to closing the dam.

The dam generate a great deal of power for the area and the valley. From what I understand that's about 6%. We have enough issues with power, why make it harder to have.

The lake is the biggest source of water for Anchorage. Are they crazy to deplete their water source??

If they want more fish; why not re-open the hatchery at Jim Creek, just below the power station is. Not every river has to have fish in it. Reopening the hatchery would provide more fish and easy access to all the area.

Couldn't they just construct a salmon run next to the dam for fish access to the lake. At this day in age of design and construction that should be a lot better time, money and effort instead of losing a water and electricity source.

Thank you,

Kirk Brown
Wasilla Resident

From: [john marrero](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 30, 2024 4:14:44 PM

If we remove the dam and reduce anchorage's water supply it would be a financial, ecological & an electric power supply disaster, disaster.

From: [Michael Packard](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, January 30, 2024 4:40:51 PM

How will the 90% of the Muni water supply be replaced if the dam is removed? How many additional fish will be produced every year when more water goes into the river? looking at the study It appears additional water could add more turbidity and perhaps damage the spawning grounds thereby producing less fish. I don't think the negative impacts of removing the dam will be offset by any positives. I don't think removing the dam will increase the fish population sufficiently to justify the removal. The better option for more fish may to increase the capacity the hatchery. Can the stream handle more fish?

From: [Joseph Beckham](#)
To: [Sam Owen](#)
Cc: [beckham kyle](#)
Subject: Eklutna Power
Date: Wednesday, January 31, 2024 2:46:16 PM

Come on it doesn't get any cleaner than Hydro-electric. My only question is how do we make more of the same around the state. The out flow has made for some great fishing opportunities. Provides access for all young and old alike including handicap or special needs people. What could possibly serve the community better. Please leave a good thing alone.

From: [Aaron Arnold](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Thursday, February 1, 2024 11:15:32 PM

Leave the Dam in place, the positive reasons for the people out weigh any agenda by local woke terrorists that want to ruin Alaska

Sent from my iPhone

From: [Lindsay Standish](#)
To: [Sam Owen](#)
Subject: Eklitna dam
Date: Thursday, February 1, 2024 8:33:18 PM

I love the concept behind the removal. I am all in support of things that support wildlife and our fish but:

Getting rid of green energy seems worse to me long term for our environment, and the people that live here.

I do not support this proposal to remove the dam.

From: [Thomas Anderson](#)
To: [Sam Owen](#)
Subject: No to Dam Removal!
Date: Sunday, February 4, 2024 11:42:37 PM

As a long term resident of Anchorage, I am proud of our commitment to clean energy- best represented by our Eklutna dam: both in the clean, non-polluting energy it produces, and in the fine drinking water it supplies. To remove it would be a travesty! 90 percent of our drinking water (!) and tremendous amounts of clean electrical power are the benefits of keeping this city's silent treasure. The village of Eklutna itself gets it's power from the Eklutna dam. And what would replace it? Burning still more hydrocarbons? This is a crazy scheme, and ought to be rejected as quickly and as forcefully as possible. Sincerely, T. Anderson, Anchorage AK

From: [Robert Ferebauer](#)
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Project comment
Date: Monday, February 5, 2024 5:03:59 PM

Anchorage needs the Eklutna power plant, dam, and reservoir. The power is clean with no emissions. The water doesn't require pumping out of the ground. Removing the dam would degrade the quality of life of Anchorage residents.

Sincerely,
Robert Ferebauer

From: [Fr. Randy Hillman](#)
To: [Sam Owen](#)
Subject: Ekluna Dam
Date: Monday, February 5, 2024 6:29:06 PM

My name is Susan Hillman. I have been a member of Matanuska Electric Association for over 20 years. I firmly believe that taking out the dam is not beneficial to this area of Alaska. The population of Anchorage and the Mat-Su Borough would be harmed if the dam were destroyed. Anchorage would lose its water source, and our electric rates would rise because of the removal of the dam. Currently, the Eklutna Dam is a base-load, scaleable, and carbon neutral carbon source. We must think of how much pollution will occur if the dam is destroyed.

I understand that the Eklutna Tribe, population of 70 members, wants to remove the dam in order to restore fish migration to the river.

The dam was constructed between 1927 and 1929, and its main purpose is to provide hydroelectric power to the city of Anchorage and the Matanuska-Susitna Borough. To me, it seems unlikely that the fish migration will return after so many years. So, for the greater good, leaving the dam in place would better serve the larger population of Anchorage and the Mat-Su Borough as a water and electric source.

Susan Hillman

From: [Jackie Muncy](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 6, 2024 12:05:19 PM

Please do not remove the Eklutna Power Plant. Thank you.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Joseph & Rose White](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 9, 2024 10:33:17 PM

We're 56+ residents of Anchorage for whatever that maybe worth. We're already paying extra for the wind provided electricity and with the highly advertised natural gas availability it clearly doesn't make "any" economic sense to eliminate the eklutna hydro electricity. As a water source eklutna very likely, with it's volume and elevation, should be less costly to develop, operate and maintain that and adequate number of water wells. It took should be kept. And, yes maintain and enhance fishing and recreational opportunities to but don't eliminate it.

From: [Jeremy Hermann](#)
To: [Sam Owen](#)
Subject: Comment on Eklutna Dam
Date: Saturday, February 10, 2024 10:33:20 PM

To Whom it May Concern:

My wife and I both agree that closing the dam and removing it to allow the original waterway to flow as it did prior to the dam being built is a ridiculous idea. I thought we were trying to get away from fossil fuels? What's the plan to replace the power currently generated by the dam?

In addition the provision of clean mountain water to the residents of Anchorage is a wonderful thing as is the beautiful lake and camping area/park that has been built around the lake. What's the plan to replace all that?

I have read about other case where dams that had been long established were removed and the resulting damage caused was way more catastrophic than anyone anticipated.

There is really no positives that I'm aware of? Unless I'm mistaken. Nature has already adapted as nature does and removing the dam now will cause far more destruction to the ecosystem that has adapted than it will benefit the ecosystem.

Now that's science!

Sincerely,

Jeremy and Manilyn Hermann
(907)301-4933
(907)727-6882
Sent from my iPhone

From: [Marvin Ebnet](#)
To: [Sam Owen](#)
Subject: eklutna dam
Date: Sunday, February 11, 2024 10:25:25 AM

This is crazy talk! Why on gods green earth would anyone want to jeopardize a clean source of power, our drinking water AND source of fire water that goes into the large holding tank built some years ago.

I absolutely, unequivocally am against the removal. I have been a commercial fisherman for 38 years, to remove this Dam, the power source AND the drinking source is beyond crazy, leave it alone and let it continue to provide power, drinking water and fire water.

Marvin Ebnet
Alaska resident for over 50 years

From: [Alex Gimarc](#)
To: [Sam Owen](#); "[Julie Hasquet](#)"
Cc: bettinac@chugachboard.com
Subject: Comments in opposition to removal of Eklutna Dam
Date: Tuesday, February 13, 2024 8:19:45 AM

Published the following on Must Read Alaska (MRAK) a couple months ago when this first came up. Short form: Strong opposition to removal of the dam.

- Dam produces perhaps 5-6% of Rail Belt electricity. No reliable replacement for the lost generation is available, planned or funded.
- Dam removal will negatively impact water availability for ANC. We get 90%+ of our water from Eklutna Lake.
- Water level in Eklutna Lake is highly variable. No evidence it will support a constant flow downstream year round.
- No evidence of a stable historic population of reds ever existed in the lake. You are trying to restore a population that never existed.
- OTOH, water from Eklutna Lake DOES support 2 stocked runs of salmon at the tailrace (kings and silvers) that have actively supported sport fishermen for 30+ years.
- Removal of the dam will eliminate the possibility of using the Eklutna Lake system for pumped energy storage necessary to support large wind & solar being currently contemplated (Bob Seitz suggestion in MRAK).
- No small number of Eklutna tribe members want the dam removed so they can rebuild one on their land, which makes this little more than another tribal corporation money grab not unlike Fire Island wind.

This is a dumb idea. Don't do it. Cheers –

- AG
Alex Gimarc
Chugach Board Member 2007 – 2010
907-441-5343

=====

<https://mustreadalaska.com/alex-gimarc-removing-the-eklutna-dam/>

Alex Gimarc: Removing the Eklutna Dam

By [SENIOR CONTRIBUTOR](#) - December 29, 2023



By ALEX GIMARC

Must Read Alaska [reported a few weeks ago](#) that the Anchorage Assembly asked the legislature to approve removal of the Eklutna dam, ostensibly to rebuild a salmon run gone for at least a century.

This is the same Assembly majority that has managed to turn the homeless problem in town into a festering sore on the body politic. That festering sore has been financially lucrative for one of their members (Meg Zaletel) who they have determined not to have a conflict of interest.

With the decision to support removal of the Eklutna dam, the Assembly manages to get themselves into the energy business, and into the ever-contentious Cook Inlet fish wars while they pander to the 70 or so members of the Eklutna Tribe, something that apparently makes them feel good. The rest of us, not so much.

Their request is so well thought out that I am reminded of [PJ O'Rourke's observation](#):

"Giving money and power to government is like giving whiskey and car keys to teenage boys."

With this recommendation, the Assembly majority has finished the whiskey and is inserting the car keys into the ignition.

A deeper dive into the three issues revolving around the removal of the Eklutna dam is probably worth our time. From here, the issues include the following. There are likely more, but this is a start:

- – *Electrical generation*
- – *Anchorage water*
- – *How many fish?*

The Eklutna hydro station has been operating since 1955. It was sold to the three electric utilities, Chugach, MEA and ML&P in 1991. That sales agreement set a 30-year clock on returning the river to its natural state. Chugach and MEA published a draft of their [Fish and Wildlife Program](#) in Oct. The fourth utility involved is AWWU, as Anchorage gets 90% of its water from the same infrastructure used to generate electricity.

Eklutna hydro generates 40 – 47 MW of clean, reliable, carbon free electricity, just over 5% of all electricity generated in the Railbelt. The Eklutna dam raised water level in the lake some 24' from its natural level. That natural level changes throughout the year based on snowmelt. The intake is at the bottom of the lake, 60' below the current surface. AWWU's water comes off a tap to that piping system.

[Advocates for removing the dam believe there is enough water available to support rebuilding the salmon runs](#), generating electricity and supplying water for Anchorage if the dam is removed. The immediate question is how will this water be allocated? Whose needs are most important? Our experience in the endangered species world is that the needs of the fish ALWAYS override those of the humans (delta smelt in California and snail darter in Tennessee).

Today, 90% of the flow is used for electrical generation. 10% of that flow is used for drinking water. Cut that flow in half, and output from Eklutna hydro will necessarily drop by a similar percentage. The intake was blocked for some weeks to months following the 1964 quake by an underwater landslide. It can be blocked again.

Additionally, there are two stocked salmon runs below the [Eklutna hydro plant in its tailrace](#) that need continual waterflow.

Perhaps the best analysis of Eklutna lake for the presence of salmon was a [Sept 2017 paper by Loso, et al](#). They found no direct evidence in cores taken from the lake bottom for a red salmon population, though Eklutna tribal elders promised them they were a fishing village before the first dam was built in 1929.

Total population estimated entirely on Eklutna oral tradition is in the vicinity of 1,000 reds/year. It is up to the reader to determine how valuable those 1,000 fish/year are, especially since very few of them will be caught.

Note that salmon here in Upper Cook Inlet are gregarious. Silvers exploit flooding, spawning in places far outside their normal creeks and streams. All five species of salmon go up Rabbit Creek, as they also do in Campbell Creek. Very few salmon go up Eagle River. There is a small red run up a closed creek on Joint Base Elmendorf-Richardson.

If the Powers That Be make the decision to remove the dam, they will base that decision on all the [“trust me” claims by the advocates](#) like the Eklutna Tribe and Trout Unlimited that there will be no noticeable impact if the dam is removed. Of course, [the advocates have no response](#) other than trust me to questions about replacing lost electrical generation and what happens when the water levels are too low to support current water use during a dry year(s).

I would suggest the following questions be answered before any discussion of dam removal:

- How do you plan to provide drinking water for Anchorage in the event of low water levels in the lake? Who or what makes the allocation decisions? And who or what has priority?
- How do you plan on replacing 5% of Railbelt electrical generation with something that is at least as clean and reliable as hydro? That generation needs to be online before the dam is removed. Nobody has it budgeted.
- What impact of reduced water flow has on the two stocked run at the Eklutna tailrace? Do the needs of the new Eklutna fish outweigh those of the stocked fish in the tailrace and their user group? If so, why?

I always get worried when all the Usual Suspects demand immediate action to right an environmental wrong, especially when their response to all questions are “trust me.” I get more worried when the Rocket Scientists on the Anchorage Assembly are onboard.

We might get lucky. This might work out nicely. But the costs and pain level should it not will be substantial in terms of cratering electric reliability and drinking water availability. Are those costs and that risk worth the feel-goodism associated with removing yet another dam? Should be an interesting discussion.

Alex Gimarc lives in Anchorage since retiring from the military in 1997. His interests include science and technology, environment, energy, economics, military affairs, fishing and disabilities policies. His weekly column “Interesting Items” is a summary of news stories with substantive Alaska-themed topics. He was a small business owner and Information Technology professional.

=====

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Brian rathbun](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 13, 2024 5:05:16 PM

Hopefully common sense prevails and the Dam stays in Place to supply necessary water supply for public consumption and Safety.

The Anchorage Assembly Sadly continues to be a Disaster.

Respectfully,
Brian Rathbun

From: [Britton Goldberg](#)
To: [Sam Owen](#)
Subject: Re: Eklutna Dam removal proposition
Date: Tuesday, February 13, 2024 8:54:39 AM

Please do not give any consideration to the Anchorage Assembly's poorly thought out desire to remove clean hydroelectric power from your portfolio. I hike Thunderbird Falls trail every year and have yet to see any salmon there that would justify losing a strong, paid for piece of infrastructure that provides clean electricity for the area. Install a fish ladder if you must, but don't hurt the community by removing this resource, especially after the recent weather conditions we experienced.

Thank you,
Britton Goldberg
Chugiak/Eagle River resident

[Sent from Yahoo Mail on Android](#)

From: [Charles Johnston](#)
To: [Sam Owen](#)
Subject: Dam project
Date: Tuesday, February 13, 2024 4:50:53 PM

Any person of wisdom would be able to see that "any" destruction to the Eklutna dam would be totally irresponsible, subversive, and fool hardy. It doesn't take a person of knowledge and intelligence to realize that.

Leave it alone, there is no value to the destruction of that dam but the repercussion's would be disastrous.

This is nothing but environmental muscling by entities with no reason but to harm other peoples wellbeing!

C.L. Johnston

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Edwin Richards](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, February 14, 2024 8:25:43 AM

Leave the dam in place.

From: [Jack](#)
To: [Sam Owen](#)
Subject: Dam removal
Date: Tuesday, February 13, 2024 2:29:12 PM

Do not remove the dam! Anchorage needs the power and water to keep it alive!

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [katie nolan](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 13, 2024 5:01:31 PM

this project gives us clean, reliable, renewable energy and the finest drinking water in the nation. please do nothing that endangers this tremendous asset.

From: raraep@gci.net
To: [Sam Owen](#)
Subject: Eklutna Hydropower is Critical for South Central AK
Date: Tuesday, February 13, 2024 3:10:26 PM

The Eklutna Hydropower provides needed electricity to South Central Alaska.

Do not remove the dam and power plant.

The dam and power plant are critical infrastructure.

Do not damage the infrastructure.

Sincerely

Randy Ruedrich
1515 W 13th Ave
Anchorage

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Richard Sam Owen](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Tuesday, February 13, 2024 5:10:37 PM

I want reliable and COST-EFFECTIVE hydro engery and clear drining water for anchorage.

From: [Ann Crane](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Wednesday, February 14, 2024 10:03:46 PM

I strongly oppose removal of the Eklutna hydroelectric dam which supplies a significant amount of electricity to Anchorage and MatSu.

Sincerely,

Ann Crane

From: [Daniel Powers](#)
To: [Sam Owen](#)
Subject: Eklutna Lake Dam Comments
Date: Wednesday, February 14, 2024 11:19:09 AM

Dear CEA representative,

Please find my comments on the CEA Eklutna Hydro Valve Proposal below.

Thank you for considering my comments.

-Daniel Powers

Anchorage residents should not consider removing the Eklutna Lake Dam until there is 1) dedicated redundant water supply infrastructure from Eklutna Lake to the Municipality of Anchorage and 2) its 40MW of electrical generation is replaced with alternative renewable power through public private partnerships.

I believe the Chugach Electric Association, the Municipality of Anchorage and State government cannot commit to tearing out a critical piece of infrastructure that supplies fresh water to the largest population center in Alaska without back-up plans in place.

Anchorage and Matanuska Susitna residents need clear answers on three questions before any demolition of the Eklutna Dam should be considered:

1. What would it cost to replace 40MW of hydro power with available renewable power?
2. How would replacing 40MW of hydro with wind or solar change the reliability of the power for the utility in terms of rolling reserve?
3. How can we justify eliminating existing reliable renewable energy considering our commitments to global emission reductions?

From: [David Rutz](#)
To: [Sam Owen](#)
Subject: Don't remove the Eklutna Dam!
Date: Wednesday, February 14, 2024 8:09:36 PM

I am strongly opposed to removing the Eklutna Hydroelectric Dam! We need it to help supply electricity and water! Removing it will have extremely negative impacts on our electric grid and it cannot be easily, reliably or affordably replaced.

I am a member of Matanuska Electric Assn.

Dave Rutz

From: [Duane Rutz](#)
To: [Sam Owen](#)
Subject: Dam removal
Date: Wednesday, February 14, 2024 7:05:36 PM

Removal of any hydro dam is a shortsighted plan. I appose any dam removal that produces power on a local level, unless that removal means its being replaced by a more efficient hydro dam producing more KW's. Period

From: [Jane Johnson](#)
To: [Sam Owen](#)
Subject: Do NOT remove the Eklutna Dam!
Date: Wednesday, February 14, 2024 7:09:03 PM

I strongly oppose the removal of the Eklutna Dam.

Sincerely,
Jane E. Johnson
Janejohnson.jej@gmail.com
480-239-4475
Sent from my iPhone

From: [Jennifer Sandvik](#)
To: [Sam Owen](#)
Subject: Hydroelectric Dam
Date: Wednesday, February 14, 2024 9:31:35 PM

February 14, 2024

I am absolutely opposed to removing the hydroelectric dam. Here are my reasons:

- Hydroelectric is a safe and sustainable energy source.
- The infrastructure is already in place. In order to replace a project like this would take YEARS of environmental study and cost millions upon millions in legal fees alone.
- We need every source of energy we can get in Alaska. We have extremely cold winters and the cost of electric and gas is not going down. Our processing plant in Fairbanks was shut and tore down years ago. We don't want to be in a position where our citizens are freezing to death because of a decision that was made by an email campaign from people who don't even live in this state.
- What are we doing to ensure our children will have viable energy sources here in Alaska
- Doing away with the hydroelectric plant does not make sense at all.

If you have any further questions, I can be reached at the above email or:

JENNIFER SANDVIK
24430 Coleman Circle
Eagle River, Alaska 99577
907-229-1365

From: [Joni Burley](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Wednesday, February 14, 2024 6:41:48 PM

The Eklutna Dam is a very efficient dam. Do not take it down for something elusive. You cannot replace it and it provides a necessary service.

I am strongly opposed to the removal of the Eklutna Dam.

Thank you,
Joni Burley
907-360-0147
Eagle River, AK 99577

From: [kassieandrews](#)
To: [Sam Owen](#)
Subject: Draft Fish and Wildlife Program Comment
Date: Wednesday, February 14, 2024 7:24:24 PM

To whom it may concern,

I do not support the removal of the dam. The special interests involved in this project have one goal and that is to foist expensive, unreliable and environmentally destructive options on us all.

Brad Meiklejohn works for the Conservation Fund and is behind the dam removal. In his own words:

“A recent book with the title One Billion Americans is terrifying to contemplate. Everything I care about would be three times worse with three times more people than the 330 million currently here. I am waiting for the rejoinder book One Hundred Million Americans because I think we need to start rapidly downsizing. Humans are doing just fine but the rest of nature is not.”

<https://rewilding.org/we-lied-to-you/>

The lead on the dam removal wants two thirds of the population eradicated. Let that sink in. These people wish us dead. They despise humanity. Who gets to decide who lives and who dies? This is horrible. Please do not let these people intentionally inflict harm on a huge percentage of the population.

This is not about fish. There are plenty of fish, available to EVERYONE at Tailrace, which is at risk. The critical supply of 90% of Anchorage's water will be lost. The critical and reliable power that we so need, especially when renewables fail and gas is short will be lost. The sunk cost of that invested into this critical infrastructure will be wasted. There will be extraordinary costs to upgrade the DOT/Railroad infrastructure when we least afford it.

Dam removal was never a part of the alternatives yet here we are. This was supposed to be a study. There is no end to what may be claimed to enact restoration projects of this sort (also happening in the lower 48) and for that reason I support a do nothing option.

Are there any rational adults in this conversation?

Please do the right thing.

Kassie Andrews
Anchorage resident

From: [Kristen Dreschler](#)
To: [Sam Owen](#)
Subject: I oppose removal of Eklutna dam
Date: Wednesday, February 14, 2024 7:04:56 PM

To whom it may concern,

I strongly oppose the removal of the Ekluta dam.

From: lrbaxter@alaskan.com
To: [Sam Owen](#)
Cc: ["Loran Baxter"](#)
Subject: Eklutna Hydro
Date: Wednesday, February 14, 2024 5:16:39 PM

Greetings,

As a retired Civil Engineer who previously worked on hydroelectric projects in Alaska including the Snettisham project that serves Juneau, I strongly encourage you to keep the Eklutna project.

Electricity from hydroelectric projects is some of the most cost effective and reliable electricity available. It is also very flexible in responding to peak demands which other forms of renewable energy are unable to do. The idea of replacing reliable Eklutna electricity with unreliable and much more expensive sources like solar or wind defies logic, especially when there is a push for renewable energy. I would encourage you to watch the Michael Moore documentary movie, Planet of the Humans available on YouTube, <https://www.youtube.com/watch?v=Zk11vl-7czE> which documents many of the problems with other forms of renewable energy.

The availability of our other reliable energy source, natural gas is becoming scarce due to limitations on future drilling and remains uncertain. Unless this trend is reversed, we may find ourselves with no reasonable alternatives to power Alaska's future.

As much as I like fish, removing the Eklutna Dam at this time, with no reliable replacement defies all logic; Therefore, I strongly encourage you to keep the Eklutna project intact.

Loran Baxter
(907) 887-6391
2 Chr 7:14

From: [Mark Hansen](#)
To: [Sam Owen](#)
Subject: The Eklutna hydro project
Date: Wednesday, February 14, 2024 10:11:46 AM

Gentlemen,

Removal of the Eklutna dam makes no sense at all. This is by far the most cost effective power source contributing to the southcentral grid. Hydro projects typically have high capital cost but very low operating cost. The longer these projects operate, the more cost effective their continued operation becomes. It is absolute nonsense to decommission this paid-for hydro project now.

What will replace the lost power? People say natural gas, but there is a looming shortage of natural gas in the Cook Inlet area. The MEA generating station at Eklutna currently operates on natural gas, but is designed to use multiple fuels if necessary. Care to pay for running it on petroleum to replace the lost hydro power? How about a new coal-fired plant? All these alternatives will be more expensive and more polluting than hydro power.

The tailrace of the hydro plant provides more salmon than could ever be expected from Eklutna River. I understand that based on study of the sediments in Eklutna Lake, there is no evidence that salmon ever spawned in Eklutna Lake.

Keep the dam. Keep the hydro plant.

Mark Hansen, P.E.
Hansen Engineering, Inc.
2605 N Old Glenn Hwy
Palmer, AK 99645
907-745-4721



Virus-free www.avg.com

From: [Meg Rutz](#)
To: [Sam Owen](#)
Subject: Leave the Eklutna Dam alone!!!
Date: Wednesday, February 14, 2024 6:26:03 PM

I am strongly opposed to removing the Eklutna Dam! It serves a vital service that cannot be replaced with the same reliability and cost!

Quit trying to force a solution on something that isn't broken, and is itself already a solution!

Mary Rutz
Chugiak, AK

MEA Coop member

From: [Mary Sims](#)
To: [Sam Owen](#)
Subject: Please keep the Eklutna Dam!
Date: Wednesday, February 14, 2024 6:12:28 PM

Hello -

Alaska should be pushing for more hydro projects. Removing the Eklutna Dam would be a huge mistake. And after the cold spell we had this year is exactly why this project needs to be defended from all the greenies out there. The government is trying to remove gas and other fossil fuels from us and if these are gone what is going to keep our homes warm, run our vehicles and provide clean electricity. Please use your heads and keep your hands off the Eklutna Dam!!!

From: rm.kemp@charter.net
To: [Sam Owen](#)
Subject: Dam
Date: Wednesday, February 14, 2024 7:12:16 PM

We strongly oppose removing the eklitns dam!
Mary & Bob Kempenich

From: [mb Kempenich](#)
To: [Sam Owen](#)
Date: Wednesday, February 14, 2024 7:17:49 PM

The removal of the I want to inform you that I strongly oppose the removal of the Eklutna dam.

Robert Kempenich.

From: [alan schneider](#)
To: [Sam Owen](#)
Subject: Hydroelectric dam
Date: Thursday, February 15, 2024 5:28:31 AM

I oppose the removal of the eklutna dam, it makes no sense
Alan Schneider
Sent from my iPhone

From: [Daniel Dreiling](#)
To: [Sam Owen](#)
Date: Thursday, February 15, 2024 6:48:09 AM

I strongly oppose removing the eklunta hydroelectric dam!

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Dave R. Rutz](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, February 15, 2024 12:40:36 PM

For 200 to 1000 extra fish per year I am sure nicer fish ladders could be installed to gain near this amount OF fish. windmills in the ocean are killing this amount or more per year now. There is a very good fishery now at the Tailrace which this would do away with so this is reverse of things getting better. We all need the power it produces so lets keep the damn as is or upgrade it. Anchorage needs the water.

From: [David Crane](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Thursday, February 15, 2024 9:48:40 PM

I strongly oppose removing the Eklutna hydroelectric dam! The dam provides a significant portion of the electricity needed to power Anchorage and MatSu.

David Crane

Sent from my iPad

From: daxcvancara@gmail.com
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Thursday, February 15, 2024 6:45:56 PM

I oppose the plan to shut down the Eklutna Hydroelectric Dam.

I am an Alaska resident.

Sent from my iPhone

From: [Nancy Schneider](#)
To: [Sam Owen](#)
Subject: Hydro dam
Date: Thursday, February 15, 2024 5:48:58 AM

I strongly oppose the removal of the eklutna hydro dam.

From: [PAMELA BEILFUSS](#)
To: [Sam Owen](#)
Subject: Hydro project shut down
Date: Thursday, February 15, 2024 4:29:17 PM

The Eklutna Lake Hydro Project has provided a great source of clean, dependable electricity for South Central and, is a water source for the Municipality of Anchorage. Leave well enough alone and don't disrupt the lives of hundreds of thousands of people for a few fish.

Randy Beilfuss
PO Box 298597
Wasilla, AK 99629

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Robert Coffin](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, February 15, 2024 9:05:12 AM

We need to maintain this hydroelectric dam as it is until such time as we can find a suitable replacement, one that can provide the same amount of power at the same cost.

From: [Sandra Harp](#)
To: [Sam Owen](#)
Subject: EKLUTNA DAMN
Date: Thursday, February 15, 2024 8:28:21 AM

I live in Anchorage. leave the damn where it's at. We depend on that damn for electricity as well as for water.

From: [Stephany papa](#)
To: [Sam Owen](#)
Subject: Eklutna Hydroelectric Dam
Date: Thursday, February 15, 2024 8:18:28 PM

To whom it may concern,

As an Alaska resident, I would like to express my concern with the removal of the dam and I would like to state that I strongly oppose removing the Eklutna Hydroelectric Dam.

Thank you,

Stephany Stevenson

From: [Tina Jennings](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Thursday, February 15, 2024 1:52:59 PM

I strongly oppose the closing of the dam.

Thanks
Tina Jennings

Sent from my iPhone

From: [Bryan Stevenson](#)
To: [Sam Owen](#)
Subject: Eklutna dam
Date: Friday, February 16, 2024 11:05:39 AM

As a life long resident of Alaska and the anchorage area I strongly oppose removal of the dam that helps power my home and my communities homes.

Bryan Stevenson

From: [Dave & Meg Rutz](#)
To: [Sam Owen](#)
Subject: I am OPPOSED to dismantling the Eklutna Hydroelectric Dam!
Date: Friday, February 16, 2024 6:52:19 PM
Importance: High

I am very OPPOSED to any efforts to dismantle the Eklutna Hydroelectric Dam. Residents from Anchorage to the Mat-Su Valley depend on that dam for a reliable, affordable, and “green” source of energy and water. There is no reason to dismantle the dam that overrides the benefits of leaving it alone. The Anchorage Assembly should not be supporting the removal of something so vital to area residents!

I am a tax-payer in the Municipality of Anchorage and a member of the MEA Coop.

Dave Rutz



Virus-free www.avast.com

From: [Timothy Wotzka](#)
To: [Sam Owen](#)
Subject: Removal or Hydroelectric Dam
Date: Friday, February 16, 2024 1:58:47 AM

To whom it may concern,

I appose the removal of the Hydroelectric Dam.

We need the power for our houses .

Tim Wotzka

From: [Lori Stender](#)
To: [Sam Owen](#)
Cc: [Lori Stender](#)
Subject: Do NOT remove the Eklutna Dam
Date: Friday, February 16, 2024 12:44:33 PM

Good afternoon. After reading through the information on the website, I urge you to NOT remove the Eklutna dam.

If the dam is removed:

I am concerned about the cost increase to my water and utility monthly bills.
I am concerned about the damage to the wildlife due to the new construction.
I am concerned about losing one of the best water recreational areas in the State of Alaska.

The benefit to the few is minimal vs the benefit to the greater with keeping the dam in place.

This dam provides a great renewal energy source. The cost for total replacement is too high. Utilize the existing infrastructure to provide the fish habitat in most of the river.

Thank you for the opportunity to comment.

Sincerely,

Lori Stender
907.830.2621

From: [Chugiak Mustangs](#)
To: [Sam Owen](#)
Subject: Do NOT dismantle the Eklutna Hydroelectric Dam!
Date: Friday, February 16, 2024 5:57:59 PM

I am an Alaska resident and MEA Coop member. I am strongly opposed to any effort to dismantle the Eklutna Hydroelectric Dam! What an insane idea that I'm guessing did not originate from Alaska residents who depend on that dam for electricity & water. It's benefits FAR outweigh the costs. It is a source of reliable, affordable, & climate-friendly energy and water. Leave it alone!

Meg Rutz
Chugiak, AK



Virus-free www.avast.com

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Ryan kenny](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 16, 2024 3:20:20 PM

re:comments on the Draft Fish and Wildlife Program

I am a resident of 99567 zip code and a member of Matanuska Electric. I am anti-dam removal. Eklutna's idea of replacing the hydro power with another renewable source will most certainly have its own negative environmental impacts somewhere else. So I do not support threatening our current water source and the non co2 emitting electric production with the hydro plant to attempt to restore fish habitat. Any gain in economic value of the restored fishery would likely be outweighed by higher utility cost and therefore harms to all members of the Muni. My personal preference is for priority to be given to efficient and economical power production, recreation, and a reliable water supply. Also please consider local resident's opinions over 'out of state' residents who are out of touch with local and state energy and utility needs.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Tim Wotzka](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 16, 2024 1:59:18 AM

i oppose the removal of the hydroelectric dam.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Tracy Reed](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 16, 2024 5:42:49 PM

i have heard a lot of talk lately that there is a proposal to remove the eklutna dam and power generation station. this is the most idiotic thing i have ever heard. The dam provides 90 % of the drinking water and 10% of the electrical power for the municipality of anchorage. how is that going to be replaced and at what cost? what about the looming natural gas shortage that already threatens the electric grid?

From: [John Lau](#)
To: [Sam Owen](#)
Subject: Eklutna Generation
Date: Saturday, February 17, 2024 3:38:16 PM

I am from Alaska and an engineer involved in the energy industry for over 40 years. I believe it is unwise to remove the Eklutna power generation facilities. Although I do enjoy fishing, I do realize the benefit of having hydropower. It's already in place, truly renewable energy, and it is very cost effective contribution to keeping our power rates low. It would take 3 Fire Island wind farms to replace the annual capacity at a much higher costs.

Please do not remove this resource.

John Lau
907-244-3980

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [pAMELA sNODGRASS](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, February 17, 2024 11:53:14 PM

hELLO eKLUTNA HYDRO. THANK YOU FOR ALL YOUR HARD WORK TO EVALUATE THE fISH AND WILDLIFE AT MY eKLUTNA LAKE. i WANT TO SAY THAT WE HAVE A GREAT LAKE. IT GENERATES WONDERFUL WATER THAT i USED TO RAISE MY FOUR CHILDREN. WE HAVE ENJOYED CAMPING AND KAYAKING ON THE LAKE. WE HAVE NEVER THOUGHT ABOUT FISHING IN THE EKLUTNA RIVER. WE HAVE ALWAYS ENJOYED THE SILVERS AT THE TAILRACE. WE NEED RELIABLE AND SUSTAINABLE POWER MORE THAN EVER. KEEP THE HYDRO POWER PLANT. sOLAR AND WIND WILL NOT WORK WELL ENOUGH TO BE RELIABLE. tELL THE GOVERNOR TO LEAVE THINGS ALONE.

From: [Francesca A](#)
To: [Sam Owen](#)
Subject: I oppose dam removal
Date: Sunday, February 18, 2024 12:19:17 PM

To whom it may concern,

I do not support the removal of the dam. This is not about fish. There are plenty of fish, available to EVERYONE at Tailrace, which is at risk. The critical supply of 90% of Anchorage's water will be lost. The critical and reliable power that we so need, especially when renewables fail and gas is short will be lost.
Dam removal was never a part of the alternatives , why are we here? This was supposed to be a study.

-Francesca Allegrezza
Anchorage, Alaska

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [George R Snodgrass](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, February 18, 2024 12:12:06 AM

I am on the board of eaglexit a group that is endeavoring to detach from the MOA and form a new borough in JBER-Chugiak-Eagle River. It is our hope in the next few years to have ownership of the MOA interest in Eklutna hydro. I can not speak for the eaglexit board or all of the residents of the Assembly District 2 now. However, many people do not want to lose their hydro power or put the great water from eklutna lake in jeopardy. but more importantly they do not want to have to pay more for either of those services. we love the reliability and sustainability of eklutna hydro. we love our eklutna village residents and feel like they have put us in a tough situation by wanting to remove the dam. spending millions of dollars to remove the dam is just not reasonable. i am afraid that they see removing the dam as their only. They have had too many white ENVIRONMENTALISTS talk to them and paying them to turn eklutna river into a wild river. it is the flavor of the day by the environmentalist and NVE is being played. we saw the young white 20 year olds pushing their remove the dam fliers at the public meeting at the Eagle river event center. they were evangelizing the dam removal and sockeye return to eklutna lake. Hello people! eklutna lake is not kenai lake and never will be. please tell the governor to not accept the expensive options. keep our hydro power and our great lake. we cannot afford to lose them.

From: [LORRAINE DERNER](#)
To: [Sam Owen](#); stephanienowersdistrict2@gmail.com
Subject: Eklutna Damn
Date: Sunday, February 18, 2024 8:56:16 PM

Hello,

Please leave the existing Eklutna damn alone. The is a valuable piece of infrastructure that does not need to be modified or degraded in any way.

It is fallacy to believe that removing the damn will bring fish back that do not even exist in waterways that do not have any obstructions.

Anchorage needs the water provided by the Eklutna damn and the Valley needs the power source.

I had the opportunity to visit the Eklutna plant and was most impressed by the efficiency of the entire facility. It is the most amazing and impressive facility that I have ever seen, and I believe it is a strategic necessity to maintain the damn.

To destroy or modify the damn would be tantamount to a crime against the people of south central Alaska.

Sincerely,

Lona Derner-Kinney

From: [Dave & Meg Rutz](#)
To: [Sam Owen](#)
Subject: Opposed to removal of Eklutna Dam
Date: Sunday, February 18, 2024 3:23:34 PM

I am very OPPOSED to any efforts to dismantle the Eklutna Hydroelectric Dam. Residents from Anchorage to the Mat-Su Valley depend on that dam for a reliable, affordable, and “green” source of energy and water. There is no reason to dismantle the dam that overrides the benefits of leaving it alone. The Anchorage Assembly should not be supporting the removal of something so vital to area residents!

I am a tax-payer in the Municipality of Anchorage and a member of the MEA Coop.

Sincerely,
Mary Rutz



Virus-free. www.avast.com

From: [Robert Seitz](#)
To: [Sam Owen](#)
Subject: Draft Fish and Wildlife Progr
Date: Sunday, February 18, 2024 9:32:16 PM

I am a Professional Electrical Engineer with 55 year experience in engineering, and over 80 years of living in Alaska. I have fished for sport, for subsistence and commercially for salmon. I consider the energy emergency to outweigh the fish emergency in the Eklutna River.

I consider that it is ill advised to remove the dam and reduce the power production from the Eklutna project so significantly at this time. Maybe after the Cook Inlet gas issued is worked out and some additional energy storage or other base energy source is added to the railbelt consideration of removing the dam would be less alarming,

Life and economy for most of Alaska is more important than a few fish at this time. I think the Eklutna river can be rehabilitated enough with the dam still in place to promote invigoration of at least some of the salmon species.

Robert Seitz, PE Electrical Engineer

From: [Sara Penisten](#)
To: [Sam Owen](#)
Subject: Opposition to Eklutna Dam Removal
Date: Sunday, February 18, 2024 1:37:25 PM

To Whom It May Concern,

I am writing to express my extreme opposition to the removal of the Eklutna dam. The claimed benefit of the “return of the salmon run” is idiotic, as any salmon that would have returned to spawn would have been hatched prior to the dam’s placement. (Please read up on salmon life cycles.)

I also oppose the acceptance of letters of support for the dam’s removal from parties outside of Alaska. Such “support” is being claimed by individuals whose lives would have no direct impact from reduced hydroelectric power generation and should have no voice in actions that put local residents’ electricity reliability at risk.

I am a 30+ year resident of the Thunderbird Heights community near Eklutna and member of Matanuska Electric Association Coop.

My expectation is that you resoundingly reject any proposed action to remove the Eklutna dam.

Sincerely,
Sara Penisten Turcic

From: [Dave & Meg Rutz](#)
To: [Sam Owen](#)
Subject: Leave the Eklutna Dam in place!
Date: Sunday, February 18, 2024 3:33:09 PM

I am opposed to the plan (as well as political efforts to delay the decision) to shut down the Eklutna Hydroelectric Dam. The dam has provided residents in Anchorage, Eagle River, Chugiak, Peters Creek and the Mat-Su Valley with a reliable, affordable, and “green” source of energy and water since the 1950’s. The Anchorage Assembly should not be supporting the removal of something so vital to area residents!

Political ideaology is the driving factor in this misplaced effort, and that needs to stop!

Non-residents should also not have a voice in this Alaskan-only decision.

I am a life-long Alaskan, and that dam has been used to power my family’s home since before I was even born.

Sara Rutz



Virus-free www.avast.com

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Andrew Laughlin, senior](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 9:10:19 PM

Do not remove the eklutna dam. It is a dispatchable renewable resource. Years of sediment will create an environmental disaster.

From: [Bob](#)
To: [Sam Owen](#)
Subject: Sam removal
Date: Monday, February 19, 2024 8:49:55 PM

Sent from my iPhone

I do not support the dam removal.

From: james.stone.ak@gmail.com
To: [Sam Owen](#)
Cc: james.stone.ak@gmail.com
Subject: Eklutna Hydro Comments
Date: Monday, February 19, 2024 9:00:15 PM

THANK YOU FOR THE OPPORTUNITY TO MAKE A COMMENT. I NORMALLY BITE MY TONGUE, BUT CONSIDERING EVERYTHING HAPPENING AT ALL LEVELS, I AM HOPING TO HELP PREVENT US FROM MAKING A MISTAKE WE WILL REGRET.

AS A COUNTRY, THERE IS AN ATTACK ON FOSSIL FUELS, WHICH WILL ONLY MAKE IT THAT MUCH MORE DIFFICULT TO LIVE SAFELY, ESPECIALLY IN OUR ENVIRONMENT. ACROSS THE WORLD, TRILLIONS ARE BEING SPENT TO CHASE CLEAN ENERGY, WITH HYDRO BEING ONE OF THE BEST. WE HAVE THAT HERE, AND SHOULD BE LOOKING TO ADD MORE HYDROPOWER, NOT TO MOVE TO OTHER ENERGY SOURCES NOT AS RELIABLE. (MY MS WAS IN PHYSICS, WITH MY FAVORITE COURSES BEING IN NATURAL ENERGY.) EVEN IN A STATE THAT HAS MORE NG THAN IMAGINABLE, OUR GOVERNMENT RESTRICTIONS ALMOST HAD US RUNNING OUT OF FUEL THIS YEAR, AND WE CURRENTLY DON'T HAVE A GOOD SOLUTION GOING FORWARD FOR NG. WE ARE TALKING ABOUT REMOVING THE BEST SOURCE OF ENERGY WE COULD HAVE? WE NEED TO NOT ONLY KEEP THIS, BUT WE ALSO NEED TO LOOK FOR MORE HYDRO OPPORTUNITIES SUCH AS A LAKE TAP HYDRO PLANT SUCH AS THE ONE IN USE IN JUNEAU. THIS IS THE BEST AND SAFEST SOURCE OF ENERGY.

PROCESS FOLLOWED TO BUILD OUR HYDRO PLANT WERE IN PLACE TO PROTECT OUR ENVIRONMENT, TO CREATE THE LEDPA SOLUTION, AND I KNOW THEY WERE EXCRUCIATINGLY FOLLOWED.

SALMON ISSUES ARE AFFECTING ALL RIVERS IN OUR STATE, SOME GREATER THAN OTHERS. I FISH THROUGHOUT ALASKA AND FOLLOW COUNTS, AND BESIDES SHIP CREEK, EKLUTNA IS ONE OF THE BEST FISHERIES BY FAR, AND IT CONTINUES TO IMPROVE AS OTHERS STRUGGLE. COULD THIS POSSIBLY BE BECAUSE THE PLANT IS ON THAT RIVER AND THE WORK DONE TO ENSURE THE SALMON WERE NOT IMPACTED ACTUALLY DID MORE TO SUSTAIN THE RUN THAN HURT THE RUN? TWISTING DATA TO SHOW EKLUTNA BEING IMPACTED FROM THE HYDRO PLANT CAN BE EASILY DONE, SOMETIMES NOT EVEN REALIZING ONE HAS SKEWED DATA THAT YOUR HEART AND SOUL THINK IS CORRECT, BUT IN THIS CASE, EKLUTNA HAS FAIRED BETTER THAN MOST RIVERS.

I WAS BLESSED TO WORK AT THE CORPS OF ENGINEERS FOR 5 YEARS WITH SOME OF THE ABSOLUTE BEST AMERICANS DEDICATED TO FOLLOWING THE LAW. I UNDERSTAND THE DUE DILIGENCE THAT MUST BE FOLLOWED. EVEN WHEN IT IS FOLLOWED AS REQUIRED AND THE LEDPA IS CHOSEN, THERE ARE MULTIPLE CASES BROUGHT AGAINST THE DECISION FOLLOWED BY APPEALS RESULTING IN THE VERY, VERY LEAST ENVIRONMENTALLY DAMAGING PRACTICABLE ALTERNATIVE.

REMINDS ME OF OUR PIPELINE, WHERE ONE OF THE COMPLAINTS WAS THE IMPACT ON THE CARIBOU, BUT THE PIPELINE RESULTED IN A PLACE FOR THE CARIBOU TO GATHER FOR THE HEAT OR THE OCCASIONAL BACK SCRATCH NOT AVAILABLE ANYWHERE ELSE ON THE SLOPE. MANY SAY THE CARIBOU ACTUALLY SEEM TO CONGREGATE NEAR THE PIPELINE. ANOTH EXAMPLE IS THE MULTIPLE CASES BROUGHT AGAINST A CORPS DECISION TO ADD BREAKERS TO JUNEAU HARBOR AS A

TEMPORARY MEASURE TO PROTECT THE HARBOR. THERE WAS COMPLAINT AFTER COMPLAINT THE WILDLIFE WOULD SUFFER, AND ALL OF THEIR STUDIES SHOWED THIS. AFTER AN EXTENDED BATTLE WHILE THE HARBOR SUFFERED, THE CORPS WAS EVENTUALLY ALLOWED TO INSTALL THE FLOATING BARRIERS. RECENTLY THE PLANS WERE COMPLETED TO ADD THE PERMANENT BREAKWATERS AND REMOVE THE TEMPORARY BARRIERS, BUT NOW THE ENVIRONMENTALISTS DON'T WANT US TO REMOVE THE FLOATING BARRIERS AS THE WILDLIFE LOVES THEM...ACCORDING TO THEIR DATA.

I ASK WE NOT ONLY KEEP THE EKLUTNA HYDROPLANT, BUT WE ALSO LOOK FOR ADDITIONAL OPPORTUNITIES TO ADD MORE HYDRO POWER TO OUR SYSTEM.

BOBBY STONE

From: [Bret Chambers](#)
To: [Sam Owen](#)
Subject: Public Comment on Eklutna Dam removal
Date: Monday, February 19, 2024 10:18:24 PM

As an Alaska resident, living in Anchorage, my family does not support removing the Eklutna Dam for the following reasons.

1) Eklutna Lake is a critical source of fresh drinking water for Anchorage and surrounding areas (totaling 130 sq miles). The City of Anchorage owned Anchorage Water and Wastewater Utility supplies over 56,000 customers (~ one quarter of a million people). We have some of the best water sources in the world, because most of it is supplied by pristine watersheds high in the Chugach Mountains, surrounded by the protected lands of the Chugach State Park. With Anchorage as the largest city in Alaska, and a key hub for visitors and commerce, we should not be doing anything to risk our water supply.

2) The economics of this proposal to destroy the remaining Eklutna Dam to possibly restore 5 species of salmon is without merit.

First off, Eklutna is an Alaska Native village of approximately 70 residents within the Municipality of Anchorage (population > 280,000). Historically, since the initial Eklutna Dam was built in 1929 atop a natural landslide dam in the Eklutna valley, through today's dam, the ability for salmon to spawn upstream was changed. However, at the same time the need for a subsistence lifestyle was also fundamentally changed. With access to the Alaska Railroad, public roads and highways, air transportation, and the economic growth of Alaska, it is now possible to obtain food (and five species of salmon) from a number of nearby sources. A person who might have fished the Eklutna river for salmon before 1929 would be over 95 years old now. Times have changed.

For an economic analysis we need to look at the tangible and intangible benefits of the current dam. I won't attempt to quantify the cost per salmon brought back, but I'm sure it's not pretty. However, on the status quo side we have:

Eklutna Hydroelectric Power is the lowest cost renewable energy in Southcentral Alaska

40 megawatts hydroelectric power capacity, produced 177,438 kilowatt hrs in 2018 (supply for more than 24,600 residential homes).

What is the cost alternative if the greater Anchorage area fresh water supply is ruined. Will we become California, forced to use our toilets as a source of treated water for drinking. We're Alaskans and know enough to not eat yellow snow.

Bret Chambers
Anchorage Resident

From: [Bruce Jaffa](#)
To: [Sam Owen](#)
Subject: Continued Service of Eklutna Lake System
Date: Monday, February 19, 2024 11:10:25 AM

I support the continued use of the Eklutna Lake System to support the population of South Central Alaska. I am familiar with the entire system including the upper lake area, powerplant, and public water system. The Hydroelectric plant is a stable, cost effective, low impact source of power for Railbelt customers. The plant was built to high standards, is well maintained and operated. Similar to other Alaska hydroelectric plants including Bradley, Terror Lake, Swan Lake, Snettisham etc. the Eklutna plant is fully amortised and operating expenses are extremely low. Compared to other planned or imagined alternative energy, this plant has 24/7 dependability.

The mitigation of previous structures downstream of the dam has nearly completely restored the river to a wild and traditional condition. This is similar to restoration of other creeks and rivers throughout the State.

There is obviously an impact by any structure and Eklutna Lake impoundment, does change some fish habitat. The species that habitate the lower River can return while the lower grade Salmon that might have used the upper reaches will not. All civilizations make trade offs. Other impacts in this area include the Power lines, the Glen Highway, the AKRR and more. I am sensitive to the individuals or groups that are most directly affected but the mitigation offered appears reasonable, providing continued benefits to all users of electricity in the distribution area of the owner utilities. In this case the potential cure is worse than the problem.

--

Bruce Jaffa

907-240-0362 Mobile
www.JaffaConstruction.com

From: [Christine West](#)
To: [Sam Owen](#)
Subject: Hydro project comment
Date: Monday, February 19, 2024 9:27:00 PM

Hello

I do not support the removal of Eklutna dam. It is the least expensive renewable form of energy for anchorage and provides 90% of drinking water for anchorage. Removing the the dam would be foolish and socially irresponsible.

Please reconsider

Christine West

Sent from my iPhone

From: [Daniel Dossat](#)
To: [Sam Owen](#)
Subject: Eklutna power plant
Date: Monday, February 19, 2024 7:52:48 PM

Please do not shut down Eklutna power plant. Anchorage can't afford to lose that plant with the natural gas shortage in Cook Inlet. Anchorage resident Daniel Dossat.
Sent from my iPhone

From: [D. Ohms](#)
To: [Sam Owen](#)
Subject: Hydro project comment
Date: Monday, February 19, 2024 7:26:48 PM

I do NOT support removal of the Eklutna dam. It is the cheapest form of renewable energy for Anchorage that already exists at a time where shortages in gas are looming. And it supplies 90% of Anchorages drinking water. Removing the dam would be completely irresponsible!

Danielle Ohms.

Sent from my iPhone

From: [Douglas Bartko](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Project
Date: Monday, February 19, 2024 6:40:59 PM

I have briefly read a few articles on the future of the Eklutna dam. It makes no sense to me to tear down the dam. I believe the dam water provides a large amount of the water needed by Anchorage. The dam provides a very inexpensive source of electricity. The Eklutna native group could settle for some type of compromise. Perhaps a fish processing plant could be build at Eklutna village area using salmon available from a new or renewed river system.

Douglas **Bartko**
Palmer

Sent from [Mail](#) for Windows



Virus-free. www.avast.com

From: [Ingeborg Lentfer](#)
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Monday, February 19, 2024 10:14:21 PM

Any logically thinking person immediately understands the devastating consequences the elimination of the Eklutna Dam would have for Anchorage. Hundreds of salmon streams around - would one more be more important than affordable, sufficient water and electricity for the Anchorage community? Eklutna dwellers who promote this are not effected by the water and electricity expenses and shortages - but Anchorage constituents certainly will be. Frank and Inge Lentfer are totally opposed to shutting down our Eklutna project.
Sent from my iPhone

From: [Irene Quednow](#)
To: [Sam Owen](#)
Cc: samc@chugachboard.com; sisic@chugachboard.com; rachelm@chugachboard.com; susannef@chugachboard.com; bettinac@chugachboard.com; markw@chugachboard.com; jimn@chugachboard.com
Subject: Public comment on the Eklutna Hydroelectric Project
Date: Monday, February 19, 2024 9:21:09 PM

Hello,

I am against the removal of the Eklutna Dam.

Most of you claim to be very concerned about the environment and our carbon footprint and are pushing the Green New Deal and the Climate Change agenda. And yet you are planning to remove the Eklutna Dam, a source of power that is both clean, renewable, has no carbon footprint, and supplies almost 50MW of electricity in the rail belt as well as most of the drinking water for Anchorage and vicinity. Not only is it hypocritical to be pushing for renewable, clean energy and reduction of our carbon footprint and at the same time destroying clean, renewable, non-CO2-producing energy production. And by the way, solar panels get covered with snow (by now they would all be buried in the snow, not just covered) and wind turbines freeze, so neither one are reliable replacements.

Here are some facts from your own presentation.

Eklutna Hydroelectric Project

Owned and operated by Chugach Electric, Matanuska Electric, and the Municipality of Anchorage.

Provides 24% of Chugach's renewable energy, and 45% of MEA's renewable energy.

Offsets approximately 86,000 tons of carbon each year.

Lowest-cost energy in Southcentral Alaska.

Could be used to regulate other future renewables like wind and solar.



Hydropower has been generating clean, renewable electricity for over 100 years, providing almost 7% of the US' electricity and 40% of renewable energy. It has enormous growth potential to power more homes, schools, and businesses. Hydropower plants can provide power to the grid immediately, serving as a flexible and reliable form of backup power during major electricity outages or disruptions. It also produces a number of benefits outside of electricity generation, such as flood control, irrigation support, and water supply.

Instead of spending an untold amount of money on the destruction of the dam and then on the building of other sources of electricity and drinking water yet to be determined, maybe your focus should be on spending the money on a way for the fish around the dam. Here is a place to start: *The NOAA Fisheries Hydropower Program works with partners including other federal agencies, industry, states, non-governmental organizations, and Tribes to identify and implement solutions to reopen rivers to migratory fish while preserving hydropower generation. With more than 1,000 hydropower dams licensed by*

the [Federal Energy Regulatory Commission](#) (FERC), NOAA Fisheries is busy keeping up with the demand to upgrade the nation's hydropower infrastructure to meet today's environmental standards.

Irene Quednow

From: [Joe Ralph](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Future
Date: Monday, February 19, 2024 11:18:37 PM

The removal of the Eklutna Dam to restore fish to the full length of the Eklutna River in light of the current use of the lake for providing Anchorage with 90% of its drinking water and providing a source of cheap reliable electricity for the area with the hydroelectric project in light of declining natural gas reserves in the Inlet makes absolutely no sense. I hope the folks involved can see through the fog and leave the system as is without negatively impacting others.

J M Ralph

From: swen@arctic.net
To: [Sam Owen](#)
Subject: Eklutna Dam
Date: Monday, February 19, 2024 1:37:02 PM

Please do not remove the Eklutna Dam. It is an important piece of infrastructure.

-James Swendseid
Resident of Anchorage.

From: [Jeanni Brooking](#)
To: [Sam Owen](#)
Subject: Hydro project
Date: Monday, February 19, 2024 8:06:16 PM

To whom this concerns,

I strongly do not support removal of the Eklutna Dam. It is the cheapest form of renewable energy for Anchorage that already exists at a time where we are experiencing shortages in gas. Eklutna supplies 90% of Anchorage's drinking water. Removing the dam would be completely irresponsible.

Thank You,

Jean Brooking

1035 W. 20th Avenue

Anchorage, Ak 99503

From: [Kim Smith](#)
To: [Sam Owen](#)
Subject: Don Not Remove Eklutna Dam
Date: Monday, February 19, 2024 7:39:14 PM

To Whom It May Concern;

I am opposed to the removal of the Eklutna Dam! 90% of our water in Anchorage is supplied by it. What are you thinking?! With the cost of everything sky rocketing these days, we need to keep this lower energy source.

Kim Smith

Sent from my iPhone

From: [Mary Vittone](#)
To: [Sam Owen](#)
Subject: Just stop the stupidity
Date: Monday, February 19, 2024 10:58:21 PM

Eklutna Hydro is the cheapest power alternative. Also it is a large portion of Anchorage's water resource. What is the other option? How will removing the damn save rate and tax payers any money?
How much money is being spent on this fruitless endeavor?

Get Smart,

Mary Vittone

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Peggy Doty](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 12:03:48 PM

I am totally opposed to the proposal to removed the Eklutna Dam. The dam is needed for water and electricity for Anchorage and is the most environmentally friendly option, is already there. Mitigation efforts should not require economic harm to Anchorage residents and removal of the dam.

From: [Riley Creed](#)
To: [Sam Owen](#)
Subject: Eklutna Dam Removal Proposal
Date: Monday, February 19, 2024 3:05:50 PM

Good afternoon,

I'm writing as an life long Anchorage resident to strongly discourage the removal of the Eklutna dam.

I was born in Anchorage in 1993 at Providence hospital. I've spent every year since growing and thriving in Alaska. I love Anchorage. I love Alaska. But I hate the route we're going to take if we cut ourselves off at the knees.

But why bother this only generates six percent of the energy?

Every little bit helps. Alaskan's rely upon ourselves. We make it work. We do our best. We strive to make a living in one of the roughest places on earth.

We've already let outside sources halt further oil production. We have representatives of our state calling to ship oil and natural gas in to supply instead of opening new wells.

Why remove something that aids both Anchorage and the Matsu on the hope it could return salmon? That's just it. It's a hope. None of the published consultations prove this would be beneficial let alone believable.

Why make Alaska worse? Why make Anchorage worse? We're already dealing with an Assembly that won't work with others or in Anchorages best interests. Spiking crime, high cost of living, lack of residential housing, and low employment rates.

It's like they want people to leave. I love Alaska. But I've watched all but one of my college mates leave state for better opportunities. I have family leaving state because it's too expensive to live and retire here.

I hate to think this but in the back of my mind I wonder when I'll have to leave. I want to grow old here. I want my career to flourish and this state to be great again. I want that for future generations as well. But right now I don't see that happening.

And this is another drop in the bucket in Alaska's slow death.

Thank you for your time,

Riley Creed

From: [Gci](#)
To: [Sam Owen](#)
Subject: Elkutna Dam
Date: Monday, February 19, 2024 8:48:45 PM

I wanted to voice my concern of the idea of the removal of the Elkutna Dam. I 100% do NOT support this idea. It would be foolish to remove something that provides a relatively inexpensive form in renewable energy to our community. Please do not consider this an option.

Thank you,
Sharon Webster

From: [Dr. Sheryl Lentfer](#)
To: [Sam Owen](#)
Subject: Dam
Date: Monday, February 19, 2024 8:27:28 PM

Born here the Eklutna dam has been servicing Anchorage for the better part of my life. It has never interfered with anyone's homes in a negative way or impacted our lives. As a matter fact it's always beautiful to fly over and lake is beautiful to spend time at.

That water shed refills beautifully every single year and nature gave us the ability to utilize it for energy. We are not causing any harm to the environment with this damn and I'm not quite sure I understand the decisions of those who want to remove the damn. From my reading majority of those people who want to remove the dam are not even from Anchorage originally and do not understand how we developed as a town and a municipality. We cannot be supported by windmills, and energies are being limited from natural gas due to federal legislation, and this is one of the most beautiful, renewable resources..... naturally. we are not lacking for water in our municipality or our state. I am not in support of the damn removal!

Sherry Lentfer, OD, FCOVD
Katmai Eye and Vision Center
12570 Old Seward Hwy., Suite 104
Anchorage, AK 99515
(907)334-3937

From: [Tom Stuits](#)
To: [Sam Owen](#)
Subject: Oppose removal of Eklutna dam
Date: Monday, February 19, 2024 8:15:12 PM

Hello,

I am writing to express my opinion that there should be no change or removal of the Eklutna Hydro Dam! I find it hard to believe that it could even be considered to be taken out at this time. We have no shortage of rivers in Alaska that have salmon in them. We do have a shortage of hydro projects. With the push toward electric vehicles and appliances, the need for hydro power will only grow. We should be exploring how to get more hydro projects and increase capacity of the Eklutna project if possible.

Plus Anchorage depends on the water too!

Thanks,

Thomas Stuits

Anchorage, AK

Sent from my iPad

From: [tom robles](#)
To: [Sam Owen](#)
Subject: Dam removal
Date: Monday, February 19, 2024 11:38:19 PM

I am fully against the removal of the dam and the lost cost and clean power it generates. I can't understand what the people that think it is a good idea think who is going to pay for it. Also they don't understand the impact to your already high electricity rates. Removing hydropower generation electricity will greatly increase our electricity costs. The lower 48 are going to see the same power cost increases when they use all the water behind lake Powell and lake Mead on the Colorado River. They keep feeding water to the southern California desert cities (LA) and Phoenix valley with water they don't have and will eventually have to ration water constantly. It is funny that California can't even recharge all their electric cars in the summer with rolling brown outs do to their lack of power generation already and it's getting worse as they force more power plants to close.

Thank you,

Tom Robles

Sent from my iPhone

B-7. Questions/Other

This page intentionally left blank.

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [TOdd Russell](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, December 21, 2023 1:30:10 PM

CAUTION: This email was received from an external source

I'm curious as to who will be able to access and fish in the Eklutna River once salmon have been restored- will this only benefit the Eklutna tribal members or will the general public be ABLE TO benefit from this project? It appears that Eklutna Inc. owns most of the affected access to this river in it's fishable area.

From: [George Farnsworth](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, January 14, 2024 1:48:02 PM

CAUTION: This email was received from an external source

C

Cost is to be born by rate users. Cost should be born by end users of the fish. Cost benefit is way out of line and is political .

Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): Email:

Write your comments on the Draft Fish and Wildlife Program here:

Wow! Where was Eklutna village (or
other "Dominant Athabascan")
input in these meetings ???

It's the same old Dominant Society
telling Natives what's good for them!

I thought Eklutna Tribe Rep would
give their verbal input!

A M Rainier

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



Eklutna Draft Fish and Wildlife Program Comment Form

Name, Agency/Organization (optional): ~~JOHN~~ JOHN HARRIS Email: JOHN FHARRIS JR @
GMAIL.
ALASKANS FOR PALMER HAYFLATS

Write your comments on the Draft Fish and Wildlife Program here:

THE BENEFIT/COST CALCULATION OMITTED
THE VALUE OF THE FISHERIES LOST. THE
ANNUAL VALUE OF THE SALMON STOCK FROM
YEAR 1955 TO DATE MUST BE APPLIED
WHEN ASSESSING THE COST & VALUE OF
THE HYDRO PROJECT. THE NATIVE VILLAGE
OF EKLUTNA HAS BEEN SUBSIDIZING MEA/CEA
RATE PAYERS FOR A GENERATION. IT'S TIME
THEY WERE REPAYED - WITH FISH.

Please note all comments will be published online to www.eklutnahydro.com

☐ Check here if you do not want your name associated with your comment on the website.

Prefer to submit your comments electronically?



Use the QR code to access the eklutnahydro.com website to submit your comments electronically. You can also send comments to info@eklutnahydro.com.

Comments must be received by **February 19, 2024**.



From: [Leslie Hiebert](#)
To: [Sam Owen](#)
Subject: Restoring Eklutna River
Date: Wednesday, January 17, 2024 11:53:52 AM

We do need to honor past agreements and accept the important responsibility of not just keeping our waterways protected but rehabilitating a natural part of our environment. At a time when humans have had such a large negative impact in Alaska, benefiting from complying with the law in that way would be honorable and responsible. Although the Municipality “owns” the land, such ownership includes stewardship, respect, and obligation.

Leslie Hiebert
Anchorage

From: [Shawn Roberts](#)
To: [Sam Owen](#)
Subject: Eklutna Hydro Project
Date: Wednesday, January 17, 2024 12:33:44 PM

As an Alaskan taxpayer, I offer the following input regarding the Eklutna hydroelectric project dam.

I believe first and foremost, the dam needs to be upgraded with the local native community and salmon fishery in mind. I say this, because I believe these two things were completely ignored at the time the dam was built.

Correcting these are the right thing to do.

With that said, water quality and resource should be maintained, but not be the priority.

Financially, the Anchorage municipality could burden the taxpayers as little as possible. One dollar a year for \$400,000 home is more like \$.20 for most people.

Thank you for allowing input,
sincerely,

Shawn Roberts
3300 Arctic Blvd, Ste 201
Anchorage, AK 99503

Sent from my iPad

From: [steve faulkner](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 17, 2024 10:46:18 AM

CAUTION: This email was received from an external source

aLL THE STUDIES DONE BUT NOT ONE FOR THOSE WHO CAN LEAST AFFORD A HIGHER ENERGY COST. aS OUR POPULATION GROWS WHERE IS ADDITIONAL POWER TO COME FROM OR ARE WE TO CAP POPULATION GROWTH? hOPING TO GET MORE FISH TO GO UP RIVER TO ESTABLISH A HABITAT IS A VERY LONG TERM IDEA. SALMON GO BACK TO THIER NATIVE SPAWNING GROUND. hOW WE CAN CHANGE THAT IS UNKNOWN. NOW IF WE INTRODUCE AN ARTIFICAL RUN THAT IS DIFFERENT.

From: [Lance Wilson](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 18, 2024 1:23:35 PM

CAUTION: This email was received from an external source

To reach the lofty goal of replacing electricity produced by burning fossil fuels with an increased percentage of electricity produced with renewable resources, you need to allow renewable projects to be constructed and go into operation. Reliability and economic sense is paramount For renewable energy projects to be successful. Hydro projects such as Eklutna have a long world-wide record of both reliability and economic operation. If fish mitigation efforts, which have a record of success, are not adopted and this becomes the reason to prevent hydro energy projects from being constructed, the whole push for increased renewable energy is a sham and is doomed to failure.

From: [CJ Koan](#)
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 7:59:30 AM

CAUTION: This email was received from an external source

This is the best natural renewal resource we have for power generation. Please keep this and build a fish ladder for the fish.

From: [Owen, Samantha](#)
To: [""Kurt Lehman""](#)
Subject: RE: New Message From Eklutna Hydro - CONTACT US
Date: Friday, January 19, 2024 3:50:00 PM

Hi Kurt,

Thank you for your comments. They have been added to the record and will be taken into consideration by the Project Owners.

To answer your questions...

1. If that's the case will the Glenn HIWAY NEED to be reconfigured to allow for flood mitigation, and at what cost? A natural flow regime in the Eklutna River could significantly impact the downstream highway bridges. These impacts are currently being evaluated as part of a more detailed assessment of dam removal.
2. Anchorages new water source? A natural flow regime in the Eklutna River would likely have significant impacts on AWWU's buried pipeline as it exists today. We are coordinating closely with AWWU to further evaluate these potential impacts and determine what actions would need to be taken to protect the public water supply under this scenario (e.g., relocating the pipeline, finding a new public water supply, etc.)
3. Is additional power available to allow for the closing of the hydro plant? what is the anticipated cost increase? If Eklutna hydro was replaced with natural gas, the present worth would equal approximately \$300M over 35-years. The cost of replacing Eklutna hydro with another firm renewable energy source, such as another storage hydro project, is currently unknown and not budgeted.
4. this is the only location providing the mobility impaired salmon fishing opportunities in south central and that could be reduced to levels not worth participating, it's already on a steady decline from just 5 or 6 years ago. Thank you for your comment.
5. How could salmon possibly make their way up such a rapid elevation change to the lake? Our models show that salmon should be able to make it up the wetted area of the Eklutna River with the proposed flow regime.

Hope that helps and thank you again.

Regards,

Samantha Owen
Senior Regulatory Consultant

owen@mcmillen.com
C: (305) 409-5201 | O: (206) 743-9251
2607 Western Ave, Unit 360, Seattle, WA 98121
mcmillencorp.com

-----Original Message-----

From: Kurt Lehman <mail@eklutnahydro.com>
Sent: Friday, January 19, 2024 2:54 PM
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US

CAUTION: This email was received from an external source

RE: Eklutna tailrace

Hello Chugach Electric!

i was unable to attend the public meetings however I wanted to provide comment on the tailrace, I'M very familiar with the tailrace from a sportsmans perspective, I have fished there for well over 20 years. My understanding from trout unlimited press release is that they want the power plant shutdown and the dam removed to allow for fish passage to the lake.

1. If thats is the case will the Glenn HIWAY NEED to be reconfigured to allow for flood mitigation, and at what cost?
2. Anchorages new water source?
3. Is additional power available to allow for the closing of the hydro plant? what is the anticipated cost increase?
4. this is the only location providing the mobility impaired salmon fishing opportunities in south central and that could be reduced to levels not worth participating, it's already on a steady decline from just 5 or 6 years ago.
5. How could salmon possibly make their way up such a rapid elevation change to the lake?

This is an observation I have seen repeatedly while fishing the upstream area of the tailrace, when salmon are in the tailrace (from june on) and the turbines speed is reduced to low levels the salmon are able to make their way to the turbine impellers are crushed and or decapitated. I have watched many fresh salmon tumble out from under the concrete spalshing on the surface with their heads crushed. I fished at the turbine outlet when the plant was not GENERATING SEVERAL years ago and the bottom was littered with fresh king salmon heads and carcasses, all the heads were pinched off, every cast i reeled in one or the other time and time again until i had enough. with the turbid water in the summer people are totally unaware of this happening. fish screens would be a great idea if the plan is to reduce the power generation (flows). A side effect of the reduced flows during the summer is that the knick river builds up a sand bar accross the mouth of the tailrace and this noticeably reduces the number of salmon in the tailrace.

I host many people fishing every year, they love the tailrace and they can't wait go back even though I take them all over the valley fishing, people love the tailrace!

I have performed the annual fire inspections for the eklutna power plant several times, it is a very interesting site and worthy of tours!

thank you for your time, Kurt lehman

From: [Owen, Samantha](#)
To: ["Bea trueblood"](#)
Subject: RE: New Message From Eklutna Hydro - CONTACT US
Date: Wednesday, January 24, 2024 3:58:00 PM

Hello,

Thank you for your comment. Just to clarify, the Project Owners executed a term sheet with AWWU that would allow them to execute the AWWU portal valve option if (and only if) it's included in the Final Fish and Wildlife Program that will be issued by the Governor in October.

Please feel free to reach out if you have any follow-up questions on the project.

Regards,

Samantha Owen
Senior Regulatory Consultant

owen@mcmillen.com
C: (305) 409-5201 | O: (206) 743-9251
2607 Western Ave, Unit 360, Seattle, WA 98121
mcmillencorp.com

-----Original Message-----

From: Bea trueblood <mail@eklutnahydro.com>
Sent: Tuesday, January 23, 2024 6:28 PM
To: owen@mcmjac.com
Subject: New Message From Eklutna Hydro - CONTACT US

CAUTION: This email was received from an external source

So we now know that awwu, at the direction of mayor bronson, signed a 35-year contract with the power companies in the fall of 2023 for the AWWU Portal valve in exchange for a bargain price on water. This secret deal happened before the end of the Alternatives analysis and way before the public process.

Now that is corruption, FOLKS.

From: [al baruth](#)
To: [Sam Owen](#)
Date: Wednesday, January 24, 2024 6:53:52 PM

I would think Winder and our solar could provide enough electricity for residents. So that d*** should definitely come down the Fisher. Important for the whole environment there are Keystone animal. You don't like the wolves and stuff. And so I hope we can get this past

From: [Robert Thompson](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Thursday, January 25, 2024 3:14:27 PM

I attended the recent public meeting at the Spenard Rec center concerning the impact of the dam on the eklutna river, and have two observations. if i understood correctly, the plan for the eklutna river salmon stocks was based on trying to keep salmon stocks to current levels, which I understand to be severely depleted. if that is the case, it seems like the responsibility to be a good steward of public resources is not being met. My other observation is that the idea of getting at least some relief to the watershed by adopting a long-term public water conservation education plan to help mitigate the pressure on this resource was conspicuously absent. I've been a resident of alaska since the 60s and do not recall ever hearing about something like that. I realize it would take time to see any real effect from a WATER conservation plan, but i think most people in the area are unaware OF PROBLEM THERE. i hope these comments will be seriously considered.

From: [cianag68](#)
To: [Sam Owen](#)
Subject: Eklutna River
Date: Thursday, January 25, 2024 11:06:02 AM

Morning,

Just read in regards to the dam that was built without consulting the Eklutna Tribe. Which, honestly, was wrong to do in the first place. Alaska has had alot of changes, and what Mr. Leggett mentioned below, he is absolutely correct.
("The Native people and the salmon have been largely neglected".)

Thank you Mr. Leggett

Tammy Michaels-Jimenez

Sent from my Galaxy

From: skycabinairships@everyactioncustom.com on behalf of [Thomas R. Wilson](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Friday, January 26, 2024 5:20:05 PM

Dear Owners of The Eklutna Hydroelectric Project,

Chugach Electric & Owners of The Eklutna Hydroelectric Project;

Re: Eklutna Creek Restoration

Having witnessed Eklutna Lake rise and fall significantly over the sixty years+ of my residency in Anchorage, I appreciate that the electric output of that hydroelectric system has been important. It represents the least expensive electric source currently available, however the effort to maximize output has resulted in the sacrifice of a once vital fishery and the complex web of the Eklutna Lake's once healthy ecosystem.

Power can continue to be extracted even with surface out flow, enough to permit spawning salmon to return to Eklutna Lake. With investments in wind & solar power plus high head (drilling can be done with great accuracy these days) other small but reliable sources could add to the generation infrastructure portfolio. In short, Eklutna electricity does not need to be maximized but, instead can supply more in line with the natural varying rates of run-off into the lake. Keeping that lake full has too many benefits to ignore!

Sincerely; Thomas R. Wilson, 1834 Sunrise Drive, Anchorage, Alaska 99508, (907) 279-9868
skycabinairships@aol.com

Sincerely,
Thomas R. Wilson
1834 Sunrise Dr Anchorage, AK 99508-3349
skycabinairships@aol.com

From: [Bill Crum](#)
To: [Sam Owen](#)
Subject: Removal of Eklutna Lake Dam
Date: Saturday, January 27, 2024 8:08:41 AM

Since my use of Eklutna Lake is for kayaking and overnighting in the available wilderness cabins, I hope the dam is maintained in such a way as to NOT diminish the size of the existing reservoir.

Bill Crum

Sent from my iPhone

From: [Scott Thomas](#)
To: [Sam Owen](#)
Subject: Can there be a win-win solution?
Date: Sunday, January 28, 2024 9:53:01 PM

Reading the letters taking sides either for hydro and the best drinking water in Anchorage vs the salmon reaching the lake like all other world class lakes in Alaska, I wonder why people argue for only one or the other? Could the Utility option to restore a majority of the river now be a win, followed by an agreement to get salmon the rest of the way in 10+ years, perhaps without specifying the means being dam removal? Are there other ways that could benefit all sides - such as fish ladders like at Ship Creek where they fill up with salmon moving upstream? I wonder if we can find a different way to preserve the lake for drinking water and energy - critical - and restore salmon to their spawning habitat and cultural significance at the lake - by other means than dam removal? That seems like a promise all sides can keep.

Scott Thomas

From: [Blaine Lee](#)
To: [Sam Owen](#)
Subject: Public Comment
Date: Tuesday, January 30, 2024 3:08:14 PM

To all concerned,

My comments are centered around the benefits of, and potential detriments to all communities in the South Central of Alaska that are affected by the power provided by the Eklutna Hydro Electric Dam.

Benefits include, but not limited to:

- Employment provided by the Utilities involved
- Reliable electricity to said areas
- Fish Hatchery that provide for the reproduction of those species
- Food the fish spawned on the waterways involved provide to
people and animals fishing those waterways
- Camping and recreational area for viewing wildlife, hiking,
photography, swimming, and boating
- Housing and jobs for the Eklutna tribe
- Employment for Spenard Builders Supply and their employees

Potential detriments include, but not limited to:

- Loss of all of the above mentioned benefits

Thank you for this avenue for communicating my concerns

Blaine Leek

From: [ken everson](#)
To: [Sam Owen](#)
Subject: Eklutna salmon restoration
Date: Wednesday, January 31, 2024 7:35:28 PM

I do not want to see a new dam built at Eklutna Lake. I want the current dam removed and the beautiful lake allowed to rejuvenate the Eklutna River and the natural population of salmon.

I am offering another way to look at this project. Reiterating information that has already been established is not my intention. Scientists, conservationists, economists, environmentalists, CEO's and politicians have all weighed in on their view of what the future should hold for the Eklutna River. Some have opinions or suggestions that can be well supported, and others don't.

There is so much information out there (thanks to expensive research) that we lose sight of the first-born objective---SAVE THE SALMON! The most immediate way this can be done is to restore the river from its start at Eklutna Lake to its termination in the Knik Arm. Building a dam is not going to put more water into the lake, it can only manage what flows out.

Our state's early visionaries did an amazing job of setting the stage for massive oil production, mining and development. Each Alaskan should appreciate that foresight but should not ignore the downside of the progress that has been made. The destruction of habitat of nature's residents is a primary example. Another aspect is the willingness by powerful people and companies to intentionally not honor promises and contracts previously agreed upon. These actions would certainly make our early visionaries' frown and possibly even cry.

Do not build a dam that may not be needed by the end of a single decade. Build a river that can exist for centuries.

Respectfully,
Ken Everson

From: jsroth10@everyactioncustom.com on behalf of [Jessica Roth](#)
To: [Sam Owen](#)
Subject: Free the Eklutna River
Date: Thursday, February 1, 2024 4:44:09 AM

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River. Do not construct the Eklutna Hydroelectric Project. This dam would not allow full capacity of water in the Eklutna River. This amount of water is needed for salmon to live in this River. Salmon are essential for the Eklutna people livelihood. Thank you for your support.

Sincerely,
Jessica Roth
Sitka, AK 99835-7459
jsroth10@live.com

From: [Del Conrad](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Friday, February 2, 2024 10:12:54 AM

The proposed solution will result in reduced power production. How will that deficit be replaced? Assuming it would come from natural gas, how much gas would be used annually, how much would it cost and what price per MCF was assumed in the analysis?

From: [Steve Kruse](#)
To: [Sam Owen](#)
Subject: Electricity first
Date: Friday, February 2, 2024 4:48:49 PM

We are running out of gas - we need the power from the Eklutna dam! Power first!

From: [Hig](#)
To: [Sam Owen](#)
Subject: Eklutna geohazards need more study
Date: Sunday, February 4, 2024 1:49:44 PM

Hello,

I'd like to comment on proposed measures to improve salmon habitat and alter hydropower generation at Eklutna Lake. This comment does not support or oppose any specific proposal, but instead raises a concern that may be critical to consider, regardless of the option under consideration.

I am a geologist who studies natural disasters, especially landslides and tsunamis. About a year ago a colleague pointed out evidence that there are large sections of the mountains above Eklutna Lake that have slowly deformed in the past. This past deformation raises concerns about the possibility that one of these slopes could suddenly collapse in the future, generating a tsunami in the lake.

This concern has led a number of geologists including myself to make some initial steps to study the potential hazard. We have been working in coordination with Carrie Brophil and Marc Lamoreaux at Eklutna Village Tribe. This work is unfunded and we have only the most preliminary results to report.

I put details below, but in short my recommendation is that any proposed development be informed by study of the potential for large (> 1 million cubic meter) deep-seated landslides from the mountains around Eklutna Lake, with the potential to create tsunamis in the lake.

First - what we do know:

The evidence of past slope deformation is extremely strong - it is almost certain that this has happened in the past. The evidence we are focusing on is for "deep-seated" landslides, which are much thicker than common landslides involving just soil. They can extend hundreds of feet into the bedrock.

We also know that similar slopes in the area have failed suddenly ("catastrophically") in the past few thousand years. In particular, there is clear evidence of a landslide that crossed upper Eklutna River and formed a dam, which eventually eroded through. There's also evidence of a large landslide that swept across upper Eagle River Valley. However, we also know that there probably have been no large landslides from the mountains into Eklutna Lake since glaciers retreated, based on surveys studying smaller landslides that happened on deltas in Eklutna Lake.

In preliminary surveys of one of the unstable slopes above Eklutna Lake, we found evidence that it has moved recently, though that evidence was quite localized - not on the scale of the full instability, which appears to be approximately 100 million cubic meters.

We have reason to believe that these mountains have permafrost in them. There are areas where "rock glaciers" occur, such as upper Thunderbird. Rock glaciers are commonly associated with permafrost. This is potentially significant because there are areas in Alaska, Iceland, and Greenland where permafrost is getting weaker as it warms up, and this is leading

to more and larger landslides.

It is also common that when we study recent catastrophic landslides, there are signs of slow creeping deformation that happened before the catastrophic landslide. This creeping deformation is what we see at Eklutna. However, it's important to remember that there are many cases where slow deformation never leads to catastrophic failures.

Finally, where we see landslides of similar size on similar slopes fall into water, they produce very destructive tsunamis that can reach hundreds of feet up shorelines. Events like this have happened in Alaska at least 5 times in the past century. Such a tsunami in Eklutna Lake could destroy existing infrastructure or future development. If a tsunami like this resulted in failure of the dam allowing more water to escape from the lake, this could increase downstream impacts.

Second, what we don't know:

Unfortunately, sites like this, where deep-seated landslides are occurring in permafrost, are very poorly understood. There is currently no generally recognized technique for estimating the probability of failure - a crucial variable with any rational assessment of cost and benefit of development at Eklutna.

We also know little about the current status of the slope. In summer of 2023 we installed a number of temperature loggers that may help us estimate the extent of permafrost. This might be the basis for future work to estimate how this permafrost is changing and what might happen in the future.

However we have no instrumentation on site to detect deformation, if it is happening. By using instruments like GPS and tilt meters to measure deformation it might be possible to see signs of acceleration that can precede catastrophic failure.

Also, while we can say in general that a catastrophic failure could create a dangerous tsunami, no modeling has yet been completed to see how extensive the impacts of such an event might be.

In short, there is a lot that could be done to better understand the slope, but this work has barely begun.

Finally - recommendations:

I believe that in cases like this where there is strong evidence of a possible hazard, it is important to accurately characterize that hazard before making costly investment in new infrastructure.

It is also important to look at the potential for added risk when the lake-level is elevated for hydropower energy storage. If this elevated risk is substantial, this might favor development that minimized elevating the lake level.

Thank you for your attention, and please feel free to reach out to me if there is more detail I can provide, or if you wish to coordinate on research.

-Hig

--

Hig (Bretwood Higman, PhD)

hig314@gmail.com

907 290 6992

Ground Truth Alaska (www.groundtruthalaska.org)

From: [Kathleen shoop](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Saturday, February 3, 2024 4:23:56 PM

I purchased the only piece of property I could afford, got my electric pole installed and I paid mea for this. if you remove my ELECTRICITY, i will not be able to survive. I am just trying to survive. hope a class action lawsiut will help the people. with no people being able to live in alaska it might as well be returned to russia, they would be better than what is happening now.

From: Teresa <churchel@alaska.net>

Sent: Monday, February 5, 2024 2:21 PM

To: Sam Owen <info@eklutnahydro.com>

Subject: Dam Removal

The Land Claim Settlement Act was reparations for all past ills put upon Alaska Natives. Or so I was told when I was at Clark Junior High in the 1970's. There were to be no further claims. This settlement gave Native groups funds and land resources to take care of their people and to use said land for purposes of revenue generation to take care of their people in trying times.

All fish in the upper Cook Inlet have diminished since the 1960's. How will fish for the Eklutna river be able to survive any better than all of the current declining runs.

When there is currently limited affordable housing in the greater Anchorage Mat-su area why do we want to make water and power even more expensive thus making housing more expensive for more people.

Teresa Churchel

From: haiku.guy
To: samc@chugachboard.com; sisic@chugachboard.com; rachelm@chugachboard.com;
Susannef@chugachboard.com; betinac@chugachboard.com; markw@chugachboard.com;
Jimn@chugachboard.com; Sam Owen
Subject: A better alternative for Eklutna Hydro
Date: Monday, February 12, 2024 5:13:43 PM

Greetings,

I am Chris Nyman, a lifelong Chugach and MLP customer.

I have recently stuck my nose into the Eklutna Fish and Wildlife mitigation project.

When I read that various parties were asking for the dam to be removed I was astonished.

That got my curiosity going so I dug into this a little bit. I am a retired civil engineer .

I don't think many people realize that removing the dam is about the same as removing the entire Eklutna Hydropower Project.

It seems antithetical that one would contemplate removing the most economical and "greenest" energy source we have.

I realize also that there has been an environmental price to pay and so the notion of restoring a minimum flow to the riverbed is laudable.

Therefore I believe that the proposed mitigation should concentrate on releasing water from the dam at the most practical times.

A perfect solution will not be found due to the continued operation of Eklutna Lake as a clean energy reservoir.

This operation seasonally lowers the lake level 25' below the spillway drain which makes the idea of supplementing the river flow difficult to accomplish.

Attached is a concept I developed in an attempt to maximize the improvement to base flow without sacrificing the capacity and operation of the Hydropower project.

Also attached is a recent 1 year look at the water level in Eklutna Lake and how it relates to the dam. Notably the lake level is high enough in mid-July through December to continually drain water through the spillway drain. My proposal, if feasible would supplement the upper reach river flow through drainage improvements when lake levels are too low.

Its a lot to present on a couple sheets of hand scratches but I think it is a good compromise that achieves some of the restoration goals of those that are calling for the abandonment of the Eklutna Hydropower Project. AND still maintaining the efficient energy supply we enjoy from our "greenest" energy source.

Truly yours....Chris Nyman

SHEET NOTES:

1. ELEVATIONS SHOWN ARE IN NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).
2. POND BATHYMETRIC PROFILE IS UNKNOWN, TOPOGRAPHY ESTIMATED BASED ON AS BUILT DRAWINGS OF DAM AND FIELD DATA.

SHEET KEY NOTES:

- A EXCAVATE NEW CHANNEL THROUGH REMAINS OF PREVIOUS STORAGE DAM. L = 625-FT.

shoreline maximum
shoreline minimum
830.0

WEIR DAM with STOP LOGS (prevent pond outflow)
Weir @ 855.6 (=spillway deck)
Top stop log @ 860.0 (example)
Top Dam @ 872.00
865 → 872 (design decision)
Supplemental Drainage Ditch

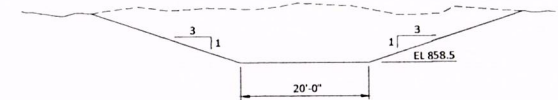
Natural Supplemental Drainage

- Replace spillway with adjustable gate/fish ladder.
- Excavate existing pond to deepen.
- Use bentonite to seal pond bottom.
- Use excavated material to build weir dam embankment.

SITE PLAN

SCALE: 1"= 100'

0' 100' 200'



TYPICAL CHANNEL SECTION

SCALE: 1"= 10'

DESIGNED: S. ELLENSON
DRAWN: R. GUERRERO
CHECKED: J. BOAG
PROJECT DATE: 05/12/23

DRAWING

F-1

REV	DATE	BY	DESCRIPTION
B	05/12/23	SPE	ADDED FISH PASSAGE ALTERNATIVE
A	05/12/23	SPE	CONCEPTUAL DESIGN

WARNING
IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE

McMillen

CHUGACH
POWERING ALASKA'S FUTURE

EKLUTNA FISH & WILDLIFE PROJECT
ENGINEERING FEASIBILITY STUDY
PME ALTERNATIVES ANALYSIS - INSTREAM FLOW
CHANNEL EXCAVATION
SITE PLAN

POND ENHANCEMENT PLAN
"holding pond Dec 15 to July 15 on avg."
"provides a source for minimum stream flow."
Submitted By Chris F. Nyman
haikuguy2003@yahoo.com

IMPORTANT [Legacy real-time page](#)



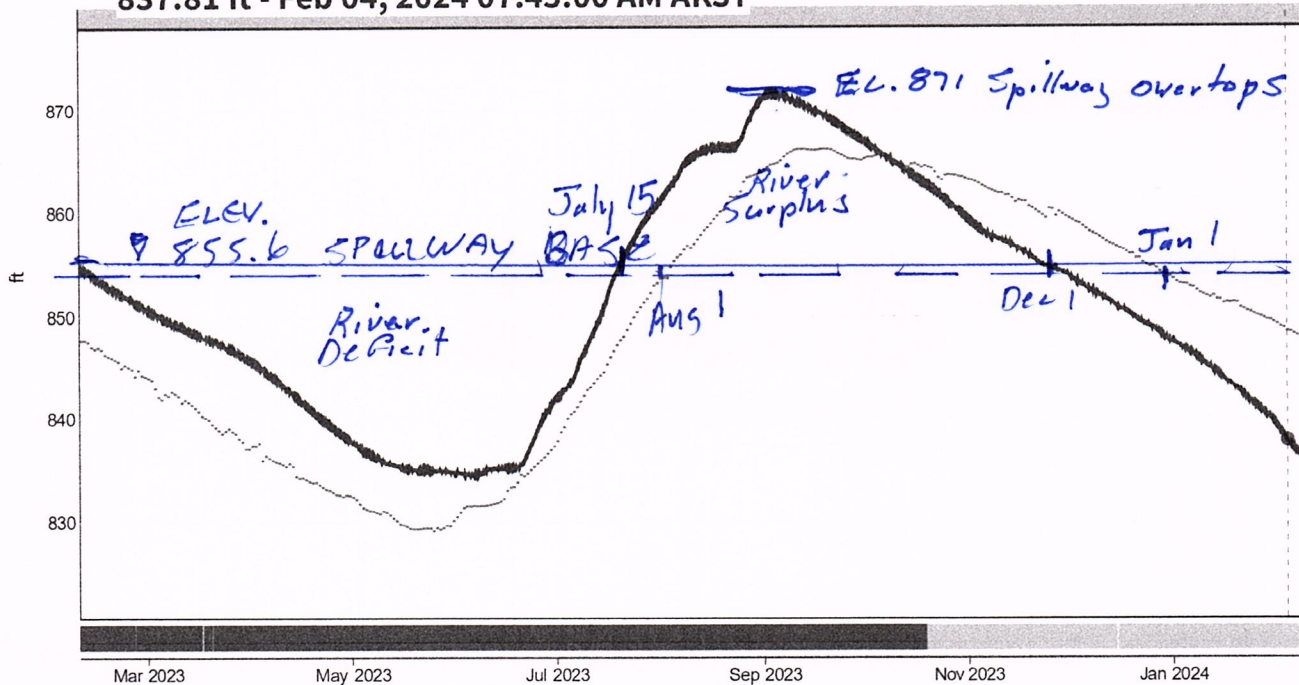
☐ 7 days ☐ 30 days ☒ 1 year

Eklutna LK NR Palmer AK - 15278000

February 8, 2023 - February 8, 2024

Gage height, feet

837.81 ft - Feb 04, 2024 07:45:00 AM AKST



IMPORTANT Data may be provisional

Show legend ▾

	Value	Status	Time
● Latest value	836.42 ft	Provisional	Feb 08, 2024 16:00:00 PM AKST
● Selected	837.81 ft	Provisional	Feb 04, 2024 07:45:00 AM AKST
● Compare			Add last year's data to graph



Submitted By :
Chris F. Nyman
harkuguy2003@yahoo.com

From: [Mark Spano](#)
To: [Sam Owen](#)
Subject: Comments on Draft Fish and Wildlife Program, Eklutna Hydro Project
Date: Monday, February 12, 2024 12:09:33 PM

I'm submitting the following comments after reviewing the materials on the project website and attending the Anchorage public meeting in January 2024. After the meeting presentation, I spoke with several of the subject matter experts to gauge whether my concerns, outlined below, are well grounded.

My Background: I worked for the Anchorage Water and Wastewater Utility (AWWU) for 30 years. I was the Water Quality Supervisor for most of that time and as such was responsible for monitoring drinking water to ensure that it met federal and state standards. I held a Water Treatment Operator certification during my time at AWWU and am knowledgeable about source water protection and treatment plant operations. I recently served seven years on the Chugach State Park Citizen Advisory Board. I do not represent either organization, but the knowledge gained from working there informs my comments.

I support the proposed plan to introduce water via the AWWU portal one mile downstream from the lake. It makes the most financial sense; it should create a flourishing fishery in the river, and it meets the intent of the 1991 agreement.

However, the reason I wish to comment is not to list the many other reasons why this option is best. It is instead to argue strongly against any option intended to introduce a flourishing fishery into Eklutna Lake by removing or modifying the dam. I have two areas of concern – negative impacts to the drinking water supply and increased adverse human/bear interactions.

Human/bear interactions:

Salmon attract bears. There is a campground next to the lake and a well-used trail adjacent to the lake along its entire length. A flourishing fishery in the lake will attract more people and bears to the lake. This will most certainly cause more bear/human interactions with increased possibility of injury or death to both.

Water Quality Impacts:

Eklutna Lake provides about 90% of AWWU's raw water supply. There isn't any other combination of AWWU's other sources that could replace this source. The first of five primary reasons for the creation of Chugach State Park, as listed in Alaska Statutes (AS 41.21.120-41.21.125), is *"To protect and supply a satisfactory water supply for the use of the people"*.

There is a possibility of negative impacts to water quality through the addition of organic compounds to the water from live and rotting fish. The process at the Eklutna Treatment Plant

is designed to remove inorganics, primarily glacial silt. It isn't designed to remove organic compounds that can combine with chlorine to cause taste and odor issues. It's difficult to gauge whether this is a legitimate concern because no one was able to give me a firm estimate of what the increased biomass to the lake might be from the introduction of a fishery. **But no robust study by a team of professionals (that should include fishery experts, water quality chemists and water treatment engineers) has been done to determine if measurable negative impacts are possible.** AWWU was represented at the meetings that led to the proposed option. But it seems, from review of the project documents and talking to the public meeting subject experts, that only the most cursory consideration of water quality impacts has been done to date and that AWWU has been more focused on impacts to infrastructure.

Even if a valid study shows that the increased biomass shouldn't cause a problem, good management practices for raw water reservoirs (which Eklutna Lake is) would carefully manage public access rather than purposely create additional recreational opportunities that will attract significantly more people to the lakeshore and into the water.

Thanks for the opportunity to comment.

Mark Spano

Anchorage

markspano55@gmail.com

From: gjoshuajr@everyactioncustom.com on behalf of [George Joshua](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Monday, February 12, 2024 5:52:09 PM

Dear Owners of The Eklutna Hydroelectric Project,

[Write your unique comment here! The letter will be sent directly from this form.]follow through with your promise to fill Eklutna lake so that the fish can start the spawning process.

Sincerely,
George Joshua
7919 Parkway Dr Anchorage, AK 99504-2839
gjoshuajr@gmail.com

From: [Will Johnson](#)
To: [Sam Owen](#)
Cc: [William Johnson](#)
Subject: Eklutna Dam Removal Proposal
Date: Tuesday, February 13, 2024 11:23:29 AM

What is often poorly understood about green energy, primarily wind and solar, is how utilities must deal with the intermittent nature of these sources. The grid must always have enough power available for peak demand, and if there is a green energy supply shortfall then "rolling reserves" must be available almost instantly, with sufficient capacity to make up the shortfall, or the grid will go down. Depending on the extent of a power outage, it can take hours to get the grid back up and power restored to all customers. It is difficult to find a better source of instant power than hydroelectric. If those who are pushing for using green energy sources are serious, and are concerned about reliability and costs, they need to think about what is available to provide these rolling reserves. Other possible alternatives are batteries or operating fossil power plants connected to the grid, which are inefficient at low loads when on standby waiting for a green energy shortage. Large fossil power plants can't be started instantly, and even combustion turbines can take several minutes or more to come up to speed and go on-line to deal with shortfalls.

Thank you,

William Johnson
3239 La Ree Way
Fairbanks, AK 99709
907-451-0088

From: [Allen Mcleod](#)
To: [Sam Owen](#)
Subject: Eklutina dam
Date: Thursday, February 15, 2024 2:10:50 PM

Hi. Allen McLeod here. Why is the eklutina dam scheduled to be removed? Or is this just a rumor? Doesn't it provide "clean" energy? Isn't it disingenuous to take out a source of renewable energy while encouraging more use of electricity to "save" the planet? And I believe I read recently that cook inlet gas reserves were waning. Encouraged to turn my thermostat down. What kind of alternative universe could this be where things that make no sense are not only considered but brought to fruition? Surely I'm not supposed to take these ideas seriously. Please. Explain. Maybe I've been misinformed. Thanks

From: [Charlie Peter](#)
To: [Sam Owen](#)
Subject: Surface Water gate to bypass Eklutna dam
Date: Friday, February 16, 2024 1:36:58 PM

It makes more sense to me to bypass the dam with a surface water gate that would feed either a fish ladder or a bypass stream that would connect to the river bed downstream of the dam.

The surface water gate could be built in sections so surface water could be released at different levels as lake levels change. CHARLIE PETER

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [Gail Rutz](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Sunday, February 18, 2024 7:02:49 PM

This agreement seems so antiquated ... eklutna, Inc., even now is looking at a massive housing development that could be curtailed by removing the dam. Can't some trade be made if necessary to increase fish by stocking the Lake to provide fishing experiences for traditional lake fishing?

From: [Robert Maier](#)
To: [Sam Owen](#)
Subject: Comments Submitted
Date: Sunday, February 18, 2024 5:18:29 PM

Of all of the ongoing discussion on this issue one item has been left undisclosed to the Taxpayers and Ratepayers of the Municipality of Anchorage by all parties involved. This concerns how those arguing for the removal of the Eklutna Dam have not informed the AWWU Ratepayers that the Anchorage Assembly will replace the Regulatory Commission of Alaska in the setting of their rates charged.

This fact has been published in an article dated January 31st in the Alaska Landmine and also January 19th in Must Read Alaska authored by myself of which I now also submit as part of these comments.

During the sale of ML&P to Chugach Electric I testified to the RCA concerning how this aspect of the sale was not being disclosed to the voters by both the MOA and CEA. The RCA addressed this issue on Page 70 – (lines 14-19) - in Order Number 39 of Docket Number U-19-020 which approved the sale of ML&P to CEA in which the RCA stated ...

“Based on the finding that MHP – (Municipal Hydro Power) – will be competing with other electric operating entities and public utilities under the MEA PPA, we also find that MHP is fully regulated under AS 42.05 pursuant to the AS 42.05.711(b)(2) exception to the exemption from regulation granted by AS 42.05.711(b). With this finding, and contrary to the expectation of the MOA, Anchorage Water and Wastewater Utility will remain subject to regulation under AS 42.05 pursuant to AS 42.50.711(b)(2).”

As none of the parties now in this current issue have disclosed this aspect as part of their fiducial responsibilities the question I asked of the RCA in my testimony concerning the sale of ML&P repeats itself.

What else is involved in this issue that Chugach Electric, the Municipality of Anchorage, the Anchorage Assembly and Matanuska Electric Association are not telling us about.

Thank you for taking the time to review these comments.

Bob Maier
Post Office Box 100177
Anchorage, Alaska 99510-0177

Sent from [Mail](#) for Windows

From: [Ken Huckeba](#)
To: [Sam Owen](#)
Subject: Grievous expansion
Date: Monday, February 19, 2024 9:41:14 PM

The only comment I have is for all parties involved to abide by the 1991 agreement at its minimum requirement.

The agreement stated to do a study and low or no cost mitigation.

The agreement did not state to include any and all input. "Stakeholders" were never mentioned in the agreement. The only parties privy to input are clearly stated.

The agreement did not state that radical outside environmental NGOs and non profits should be allowed a consideration whatsoever. The agreement did not say the dam should be removed.

The agreement did not state that an alternative should be formulated, particularly nor a \$57M project specifically tailored as a foundation towards an \$800-900M pumped storage unit to further the inflation causing, grid destroying, corrupt renewable portfolio standard.

Review the agreement and abide by it in least cost fashion. We have no funds for any other path forward.

Ken Huckeba
907-227-6390
MEA member

From: kerrywilliams@gci.net
To: [Sam Owen](#)
Subject: Eklutna missed option
Date: Monday, February 19, 2024 1:51:59 PM

I don't believe that all the potential options were properly examined.

In particular, the Eklutna PSH proposal would meet ALL the objectives sought. It would restore the lake to it's natural level, permit the complete removal of the existing dam without risk of flooding, and restore year round water to Eklutna River with a natural flow from the mouth of the lake.

Secondly, it in combination with the Little Susitna Mtn wind farm would actually lower and stabilize the cost of electricity for CEA and MEA customers. Keeping electric rates from going up - though not one of the objectives of the Eklutna rehabilitation - is a fundamental duty of our utilities. It's wrong to think that "there is no room to reexamine the option or other alternatives regardless of the impacts to rate and taxpayers". It would be totally a neglect of duty (and possibly illegal) to disregard the cost of this decision.

Hydropower is both cheaper and more reliable than natural gas, especially here. Remember that it was a natural gas failure that drove our recent cold weather near catastrophe.

Respectfully,
Kerry Williams

(907) 248-4224

From: lgoodman@everyactioncustom.com on behalf of [Lilly Goodman-Allwright](#)
To: [Sam Owen](#)
Subject: Comment on the Eklutna River Draft Fish and Wildlife Program
Date: Monday, February 19, 2024 2:09:30 PM

Dear Owners of The Eklutna Hydroelectric Project,

The public does need more time to learn about, understand, and comment on this process. We have been urged to jump on one side of the issue, but this issue seems to be very complex and warrants a thorough understanding of the impacts of both removing the dam, and NOT removing the dam.

My questions include:

- If the dam is removed, where will Anchorage get its drinking water?
 - If the dam is removed, will ground water supplies be tapped to supply Anchorage with water, and if so, what impacts could this have?
 - If the dam is removed, how will flow be restored in a way that permits fish passage? My understanding is that currently the obstacle is not so much the dam, but the current removal of the water.
 - If the dam is removed, will there be other environmentally taxing water development projects proposed as a trade-off?
-
- If the dam is not removed, is further degradation of the watershed forecasted?
 - If the dam is not removed, does this further impact the village of Eklutna?
 - Is there another method to compensate the village and people of Eklutna for their lost fishing grounds?

Thank you!

Sincerely,
Lilly Goodman-Allwright
30656 Kuparuk Ave Eagle River, AK 99577-9716
lgoodman@mtaonline.net

From: mail=eklutnahydro.com@wpdatacenter.com on behalf of [M. KEFFER](#)
To: [Sam Owen](#)
Subject: New Message From Eklutna Hydro - CONTACT US
Date: Monday, February 19, 2024 11:10:45 PM

Please ensure the cost of utilities and water access is considered. Projects can take many years, setting a firm timeline would be a challenge.

From: [William H Gilbert](#)
To: [Sam Owen](#)
Subject: Please keep the Eklutna Dam!
Date: Thursday, February 15, 2024 2:58:36 PM

Hello -

This dam was well considered before it was built and has been doing well since then.

Appendix C. Form Letters

This page intentionally left blank.

Trout Unlimited Form Letter – Version 1

To the operators of the Eklutna Hydroelectric Project,

The draft Fish and Wildlife Plan you proposed for the Eklutna River does not meet the needs of salmon, the vision of the Eklutna Peoples, or your legal obligation to mitigate the project's impact to fish and wildlife. Leaving a mile of the river dry, releasing only 3% of historic flows, and not providing fish passage into the lake and upstream habitat will not restore the river's salmon runs and are unacceptable.

Instead of wasting ratepayer and taxpayer money on a mitigation plan that won't fully revive salmon runs, **I ask you to remove the Eklutna Dam to fully reconnect the river and return the water flows needed to support the river's fisheries.**

I understand the reliance on this hydroelectric energy source in the near-term, and the proposal to remove the Eklutna Lake dam within the next decade, when replacement renewable energy is expected to be available, is reasonable. I also appreciate that community partners are willing to pitch in to help offset costs of the dam removal – taking advantage of this opportunity seems like a fiscally smart decision.

The Native Village of Eklutna has clearly communicated their vision for thriving wild salmon in the Eklutna River, including Eklutna Lake and headwater tributaries. Your ratepayers and many Alaskans support this vision.

The Eklutna Hydroelectric Project deprives the Eklutna River of water and blocks salmon from migrating in and out of Eklutna Lake. Salmon populations will not recover without a reliable and consistent supply of water and access to important up-stream spawning and rearing areas. This is particularly true for sockeye salmon, if they cannot access Eklutna Lake and its tributaries. CEA, MEA and MOA cannot meet their mitigation obligations within their budget constraints with anything less than removing the dam.

Now is your one chance to make this right. **Now is your chance to invest in a river that Alaskans can be proud of and help show the world that Anchorage does not just love our salmon, we know what it takes to care for them and actively work to bring them back.**

Submitted by:

Name	Date	Area of Residence	Name	Date	Area of Residence
Adrienne Lindholm	2/6/2024	Service Area	Heather Filice	2/6/2024	Out of State
Alexa Millward	2/6/2024	Service Area	Jessica Tarbutton	2/6/2024	Out of State
Alyssa Berger	2/6/2024	Service Area	John Vatalaro	2/6/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Ann Dougherty	2/6/2024	Service Area	Kristopher Filice	2/6/2024	Out of State
April Harbison	2/6/2024	Service Area	Logan Gillingham	2/6/2024	Out of State
Bryan Arnold	2/6/2024	Service Area	Michael Saucy	2/6/2024	Out of State
Chung Ha	2/6/2024	Service Area	Allen Aronson	2/15/2024	Out of State
Debra Call	2/6/2024	Service Area	Bruce Williams	2/15/2024	Out of State
Eric Booton	2/6/2024	Service Area	Chuck Gehling	2/15/2024	Out of State
Grace Nichols	2/6/2024	Service Area	Daniel Hewko	2/15/2024	Out of State
Jenny Weis	2/6/2024	Service Area	Daniel Smart	2/15/2024	Out of State
John Koltun	2/6/2024	Service Area	David Carmichael	2/15/2024	Out of State
John Lindholm	2/6/2024	Service Area	E Silas Axtell	2/15/2024	Out of State
Kenneth Everson	2/6/2024	Service Area	Eric Abrams	2/15/2024	Out of State
Kimberly Miller	2/6/2024	Service Area	Eric Tichay	2/15/2024	Out of State
Kira Lena Lajarnie	2/6/2024	Service Area	Gary Delcourt	2/15/2024	Out of State
Liam Dooley	2/6/2024	Service Area	James Taylor	2/15/2024	Out of State
Linda Hilton	2/6/2024	Service Area	Jason Sikma	2/15/2024	Out of State
Lucan Seymour	2/6/2024	Service Area	Jeff Desmond	2/15/2024	Out of State
Patrick McElgunn	2/6/2024	Service Area	Jim Byrne	2/15/2024	Out of State
Samuel Theis	2/6/2024	Service Area	John Kinabrew	2/15/2024	Out of State
Schuyler Deeney	2/6/2024	Service Area	John MacDonald	2/15/2024	Out of State
Suzanne Marcy	2/6/2024	Service Area	John Zarnetske	2/15/2024	Out of State
Tom Reale	2/6/2024	Service Area	Karen Gremminger	2/15/2024	Out of State
Whitney Waskey	2/6/2024	Service Area	Kirk Kowalke	2/15/2024	Out of State
Adam Cuthriell	2/15/2024	Service Area	Mark Culpepper	2/15/2024	Out of State
Aerin Gaines	2/15/2024	Service Area	Mark Miller	2/15/2024	Out of State
Anthony Perelli	2/15/2024	Service Area	Mark Reinhardt	2/15/2024	Out of State
Barbara Reilly	2/15/2024	Service Area	Michael Dunn	2/15/2024	Out of State
Chris Little	2/15/2024	Service Area	Michael James	2/15/2024	Out of State
Claire Kaufman	2/15/2024	Service Area	Michael Simko	2/15/2024	Out of State
George Geiges	2/15/2024	Service Area	Mike LoPresti	2/15/2024	Out of State
Ivan Encelewski	2/15/2024	Service Area	Murray Brigham	2/15/2024	Out of State
Joyce Guest	2/15/2024	Service Area	Nick Masi	2/15/2024	Out of State
Larry Casey	2/15/2024	Service Area	Paul Doscher	2/15/2024	Out of State
Luc Mehl	2/15/2024	Service Area	Peter Hansberger	2/15/2024	Out of State
Mary Ann Thomas	2/15/2024	Service Area	Phil Spohn	2/15/2024	Out of State
Matthew Pyhala	2/15/2024	Service Area	Richard Carosone	2/15/2024	Out of State
Michael Adams	2/15/2024	Service Area	Richard Heller	2/15/2024	Out of State
Philip Hilbruner	2/15/2024	Service Area	Teresa Sopher	2/15/2024	Out of State
Ptery Lieght	2/15/2024	Service Area	Thearin Wendel	2/15/2024	Out of State
Rebecca King	2/15/2024	Service Area	Thomas Cizdziel	2/15/2024	Out of State
Roman Weber	2/15/2024	Service Area	Timothy Devine	2/15/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Mary Graves	2/6/2024	Other Part of Alaska	Vince Sereno	2/15/2024	Out of State
Maureen Knutsen	2/6/2024	Other Part of Alaska	William Brooks	2/15/2024	Out of State
Brenda Johnson	2/15/2024	Other Part of Alaska	Zac Holt	2/15/2024	Out of State
Rich Preston	2/15/2024	Other Part of Alaska	Evan Nelson	2/17/2024	Out of State
Alanis Berger	2/6/2024	Out of State	George Bennett	2/17/2024	Out of State
Edward Fannon	2/6/2024	Out of State	Greg Krochta	2/17/2024	Out of State

Trout Unlimited Form Letter – Version 2

Eklutna Power Companies & Alaska Governor,

As ratepayers, we believe affordable electricity and abundant drinking water are possible alongside healthy wild salmon runs in the Eklutna River. Removing the Lower Eklutna Dam in the summers of 2017-18 was the first step in restoring the Eklutna River. The second step is to restore streamflow and provide access for salmon to their historic spawning and rearing areas so wild salmon populations can flourish once again.

Eklutna River salmon have been strained by inadequate water flows and blocked migration for nearly a century. As ratepayers and residents of the area, we encourage you to move quickly to restore this important river.

We recognize and appreciate the efforts the utilities have taken to study the impacts of the Eklutna Project. We hope you recognize the unique opportunity for the Eklutna River and encourage you to develop and implement a comprehensive mitigation plan that fully restores the river and its wild salmon by restoring streamflow and providing fish passage past the remaining Eklutna dam.

The Eklutna River is important to the people of the Native Village of Eklutna and the neighboring communities and nearby cities. Restoring robust wild salmon populations to the Eklutna will help restore subsistence opportunities, promote new recreation opportunities, and rebuild a wild salmon population in the heart of Southcentral Alaska that we can all be proud of.

Submitted by:

Name	Date	Area of Residence	Name	Date	Area of Residence
Alejandro Lozano	2/16/2024	Service Area	Mackenzie Pope	2/17/2024	Service Area
Alex Rodriguez	2/16/2024	Service Area	Maddy Lee	2/17/2024	Service Area
Brian Fay	2/16/2024	Service Area	Malia Acovak	2/17/2024	Service Area

Name	Date	Area of Residence	Name	Date	Area of Residence
Chelsea Dischner	2/16/2024	Service Area	Margo Goodman	2/17/2024	Service Area
Dan Bissinger	2/16/2024	Service Area	Maribel Terry	2/17/2024	Service Area
Esther Smith	2/16/2024	Service Area	Matthew Dischner	2/17/2024	Service Area
Halen Hernandez	2/16/2024	Service Area	Matthew Schneider	2/17/2024	Service Area
Harold Shepherd	2/16/2024	Service Area	Maxim Manrah	2/17/2024	Service Area
Jasmine Parter	2/16/2024	Service Area	Mckayla Montgomery	2/17/2024	Service Area
Jessica Greene	2/16/2024	Service Area	Megan Engler	2/17/2024	Service Area
Jose Mora	2/16/2024	Service Area	Michael Fageke	2/17/2024	Service Area
Justin Hall	2/16/2024	Service Area	Mikayla Terry	2/17/2024	Service Area
Kat Haber	2/16/2024	Service Area	Mike Lutomski	2/17/2024	Service Area
Katey Shedden	2/16/2024	Service Area	Miranda Beach	2/17/2024	Service Area
Laniee Whetman	2/16/2024	Service Area	Miriah Phelps	2/17/2024	Service Area
Mark Rakozzy	2/16/2024	Service Area	Nancy McWilliams	2/17/2024	Service Area
Nick Butryn	2/16/2024	Service Area	Nancy Thibodeau	2/17/2024	Service Area
Sarah Doaty	2/16/2024	Service Area	Nickolaos Gianncelis	2/17/2024	Service Area
Abby Burke	2/17/2024	Service Area	Randy Redman	2/17/2024	Service Area
Adriana Arroyo-Cruz	2/17/2024	Service Area	Rebecca Logan	2/17/2024	Service Area
Alexa Helm	2/17/2024	Service Area	Reese Ramponi	2/17/2024	Service Area
Allyson Burdett	2/17/2024	Service Area	Robert Johnson	2/17/2024	Service Area
Amy Holonics	2/17/2024	Service Area	Robert Rima	2/17/2024	Service Area
Amy Lundstrom	2/17/2024	Service Area	Robin Mcknight	2/17/2024	Service Area
Andy Paul	2/17/2024	Service Area	Sam Gr	2/17/2024	Service Area
Anna Peterson	2/17/2024	Service Area	Sam Lebo	2/17/2024	Service Area
Annika Kemp	2/17/2024	Service Area	Sarah McIntosh	2/17/2024	Service Area
Ariel Hyams	2/17/2024	Service Area	Sarah Paige	2/17/2024	Service Area
Aubree Day	2/17/2024	Service Area	Savannah Zimmerman	2/17/2024	Service Area
Belinda Hill	2/17/2024	Service Area	Shane Beason	2/17/2024	Service Area
Betsey Rogers	2/17/2024	Service Area	Sharon Kirr	2/17/2024	Service Area
Blake Scott	2/17/2024	Service Area	Sondra McCotter	2/17/2024	Service Area
Brian Fulkerson	2/17/2024	Service Area	Spencer Jones	2/17/2024	Service Area
Brian Kramp	2/17/2024	Service Area	Sue Rennolds	2/17/2024	Service Area
Brianna Sherer	2/17/2024	Service Area	Sydney Scout	2/17/2024	Service Area
Bry Navis	2/17/2024	Service Area	Teresa Frier	2/17/2024	Service Area
Carol Jewell	2/17/2024	Service Area	Thea Sutton	2/17/2024	Service Area
Carolyn Masrey	2/17/2024	Service Area	Theresa Huebler	2/17/2024	Service Area
Charles Earnshaw	2/17/2024	Service Area	Thomas Yukman	2/17/2024	Service Area
Charlie Runde	2/17/2024	Service Area	Tom Thibodeau	2/17/2024	Service Area
Charlotte Correiro	2/17/2024	Service Area	Tony Beard	2/17/2024	Service Area
Chisie Hoffman	2/17/2024	Service Area	Tracey Wiese	2/17/2024	Service Area

Name	Date	Area of Residence	Name	Date	Area of Residence
Chris Creglow	2/17/2024	Service Area	Victoria Bledsoe	2/17/2024	Service Area
Christalyn Panganiban	2/17/2024	Service Area	Victoria Cichocki	2/17/2024	Service Area
Christie Reinhardt	2/17/2024	Service Area	Willow-Creek Feighery	2/17/2024	Service Area
Coral Berry	2/17/2024	Service Area	Zayleen Kalalo	2/17/2024	Service Area
Corina Torgesen	2/17/2024	Service Area	Zoe Stonerov	2/17/2024	Service Area
Curtis Creglow	2/17/2024	Service Area	Ian Dobke	2/16/2024	Other Part of Alaska
Daniel Owen	2/17/2024	Service Area	Lily Ayau	2/16/2024	Other Part of Alaska
David Paperman	2/17/2024	Service Area	Arica Dobbe	2/17/2024	Other Part of Alaska
Dawn Schneideer	2/17/2024	Service Area	Aubnelle Champagne	2/17/2024	Other Part of Alaska
Delissa Owen	2/17/2024	Service Area	Cayla Barnes	2/17/2024	Other Part of Alaska
Delmar Pencher	2/17/2024	Service Area	Jared Quirk	2/17/2024	Other Part of Alaska
Devin Barnhurst	2/17/2024	Service Area	Joevahata Usugan-Weddington	2/17/2024	Other Part of Alaska
Dylan Gillespie	2/17/2024	Service Area	Kaley McGoey	2/17/2024	Other Part of Alaska
Ed Gurtler	2/17/2024	Service Area	Katerine Russell	2/17/2024	Other Part of Alaska
Ed Kobar	2/17/2024	Service Area	Marina Storm	2/17/2024	Other Part of Alaska
Elaine Aniy	2/17/2024	Service Area	Rodyn Dahl	2/17/2024	Other Part of Alaska
Emily Conloque	2/17/2024	Service Area	Shelby Rehmer	2/17/2024	Other Part of Alaska
Emma Laatsch	2/17/2024	Service Area	Steve Imhoff	2/17/2024	Other Part of Alaska
Engel Goodnight	2/17/2024	Service Area	Stran Stensland	2/17/2024	Other Part of Alaska
Erika Berube	2/17/2024	Service Area	Teresa Duncan	2/17/2024	Other Part of Alaska
Estel Adler	2/17/2024	Service Area	Alex Vale	2/15/2024	Out of State
Evan Mitchell	2/17/2024	Service Area	Anacia Rael	2/15/2024	Out of State
Gina Creedon	2/17/2024	Service Area	Bernadette Hawkins	2/17/2024	Out of State
Guadalupe Ochoa	2/17/2024	Service Area	Beth Cronin	2/17/2024	Out of State
Hailey Thompson	2/17/2024	Service Area	Christopher Kaiakaph	2/17/2024	Out of State
Hannah Larue	2/17/2024	Service Area	Cole Pumpe	2/17/2024	Out of State
Irene Bembenek	2/17/2024	Service Area	Cora Mckean	2/17/2024	Out of State
Isabel Beach	2/17/2024	Service Area	Dorice Hughes	2/17/2024	Out of State
Isabella Ennen	2/17/2024	Service Area	Emma Laue Lie	2/17/2024	Out of State
Jadyn Dennis	2/17/2024	Service Area	Erin Alberrts	2/17/2024	Out of State
James Lynn	2/17/2024	Service Area	Gayle Imhof	2/17/2024	Out of State
Janet Bacher	2/17/2024	Service Area	Haley Vandyck	2/17/2024	Out of State
Janine Kisala	2/17/2024	Service Area	Hannah Jackson	2/17/2024	Out of State
Jasmine Carter	2/17/2024	Service Area	Heather Bartz	2/17/2024	Out of State
Jennifer Isham	2/17/2024	Service Area	Jamie Earlywine	2/17/2024	Out of State
Jennifer Liepa	2/17/2024	Service Area	Jane Garret	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Jesse Tiazer	2/17/2024	Service Area	Jess Helsley	2/17/2024	Out of State
Jessica Alder	2/17/2024	Service Area	Jon Michail Relima	2/17/2024	Out of State
Jodie Breen	2/17/2024	Service Area	Karen Shemon	2/17/2024	Out of State
Jordan Kara	2/17/2024	Service Area	Katelyn Burns	2/17/2024	Out of State
Kellie Monroe	2/17/2024	Service Area	Maree Feld	2/17/2024	Out of State
Kelly Sue Herman	2/17/2024	Service Area	Margeret Hurst	2/17/2024	Out of State
Kendall Benoit	2/17/2024	Service Area	Michael King	2/17/2024	Out of State
Kevin Crowley	2/17/2024	Service Area	Nathan Davis	2/17/2024	Out of State
Kimberly Lloyd	2/17/2024	Service Area	Oylen Adavis	2/17/2024	Out of State
Lauren Hurst	2/17/2024	Service Area	Rebecca Gleman	2/17/2024	Out of State
Lily Mochels	2/17/2024	Service Area	Wes Michels	2/17/2024	Out of State
Lyle Buckler	2/17/2024	Service Area			

Trout Unlimited Form Letter – Version 3

Now is your time to act for Eklutna salmon. As operators of the Eklutna Hydroelectric Project, you are legally required to make up for the project's impacts to fish, wildlife and their habitat. The decisions you make today will determine whether Eklutna salmon can recover and once again return in abundance. The fate of Eklutna wild salmon is in your hands. Please respect the gravity of your actions and choose accordingly.

Native Village of Eklutna has clearly communicated their vision for thriving wild salmon in the Eklutna River, including in Eklutna Lake and headwater tributaries. Your ratepayers and Alaskans support this vision. The Eklutna Hydroelectric Project deprives the Eklutna River of water and blocks salmon from migrating in and out of Eklutna Lake. The utilities have the obligation to make up for these impacts and do right by the Eklutna people and the Eklutna River.

Salmon populations will not recover without a reliable and consistent supply of water and access to important up-stream spawning and rearing areas. Sockeye salmon will not return if they cannot access Eklutna Lake and its tributaries. CEA, MEA and MOA cannot meet their mitigation obligations with anything less. Since it was originally built in 1955, Eklutna Hydroelectric Project has been a barrier to salmon migration and cut off water to the Eklutna River, causing a dry channel devoid of salmon for most of its length. Now is your one chance to make this right.

Submitted by:

Name	Date	Area of Residence	Name	Date	Area of Residence
Barbara Melland	2/15/2024	Service Area	Bruce Waring	2/15/2024	Out of State
Brenda Hewitt	2/15/2024	Service Area	Christopher Gagnon	2/15/2024	Out of State
Brian Ritchie	2/15/2024	Service Area	David Stone	2/15/2024	Out of State
Brittany Thurstin	2/15/2024	Service Area	Denise Antony	2/15/2024	Out of State
Bruce Service	2/15/2024	Service Area	Dennis Jung	2/15/2024	Out of State
Cathleen Gordon	2/15/2024	Service Area	Douglas Shinn	2/15/2024	Out of State
Chennery Fife	2/15/2024	Service Area	Dr Alan Nissanbaum	2/15/2024	Out of State
Cindi Witt	2/15/2024	Service Area	Dr Bruce Finney	2/15/2024	Out of State
Dave Maternowski	2/15/2024	Service Area	Edward Kohler	2/15/2024	Out of State
Dawn Nixon	2/15/2024	Service Area	Eric Grams	2/15/2024	Out of State
Della Coburn	2/15/2024	Service Area	Gary Vilhauer	2/15/2024	Out of State
Jane Miles	2/15/2024	Service Area	Janell Bear	2/15/2024	Out of State
Jeannie Johnson	2/15/2024	Service Area	Janice Klinski	2/15/2024	Out of State
Jeff Chen	2/15/2024	Service Area	Jeff Theo	2/15/2024	Out of State
Jeff Stroke	2/15/2024	Service Area	Jeffrey Plackis	2/15/2024	Out of State
Jessica Thornton	2/15/2024	Service Area	Joe Kayafas	2/15/2024	Out of State
Jonathan Galin	2/15/2024	Service Area	John Hencke	2/15/2024	Out of State
Kendra Mclean	2/15/2024	Service Area	John Wondzell	2/15/2024	Out of State
Larry Hayden	2/15/2024	Service Area	Kevin O'Carroll	2/15/2024	Out of State
Leanne Warner	2/15/2024	Service Area	Kyle Schultz	2/15/2024	Out of State
Marian Giannulis	2/15/2024	Service Area	Matthew Roach	2/15/2024	Out of State
Mark Van Arsdale	2/15/2024	Service Area	Melissa Wong	2/15/2024	Out of State
Martica Drury	2/15/2024	Service Area	Michael Davis	2/15/2024	Out of State
Meghan Barker	2/15/2024	Service Area	Mickey Reves	2/15/2024	Out of State
Michael Dutton	2/15/2024	Service Area	Patricia Browne	2/15/2024	Out of State
Michael Funke	2/15/2024	Service Area	Patrick Camp	2/15/2024	Out of State
Oleks Lushchuk	2/15/2024	Service Area	Peter Williamson	2/15/2024	Out of State
Patrick Roobol	2/15/2024	Service Area	Richard Van Aken	2/15/2024	Out of State
Peter Lyford	2/15/2024	Service Area	Rick Casey	2/15/2024	Out of State
Raye Neustel	2/15/2024	Service Area	Robert Mueller	2/15/2024	Out of State
Stephanie Freitag	2/15/2024	Service Area	Russell Burdette	2/15/2024	Out of State
Thom Yukman	2/15/2024	Service Area	Shane Larson	2/15/2024	Out of State
Trevor Staples	2/15/2024	Service Area	Shelley Rowton	2/15/2024	Out of State
Whitney Cavazos	2/15/2024	Service Area	Thomas Smith	2/15/2024	Out of State
Willi Prittie	2/15/2024	Service Area	William Blair	2/15/2024	Out of State
Anika Pinzner	2/15/2024	Other Part of Alaska	William Yingst	2/15/2024	Out of State
Dr Kevin Fraley	2/15/2024	Other Part of Alaska	Gary Becker	2/17/2024	Out of State

Trout Unlimited Form Letter – Version 4

To the operators of the Eklutna Hydroelectric Project,

The draft Fish and Wildlife Plan you proposed for the Eklutna River does not meet the needs of salmon, the vision of the Eklutna Peoples, or your legal obligation to mitigate the project's impact to fish and wildlife. Leaving a mile of the river dry, releasing only 3% of historic flows, and not providing fish passage into the lake and upstream habitat will not restore the river's salmon runs and are unacceptable. Instead of wasting ratepayer and taxpayer money on a mitigation plan that won't fully revive salmon runs, I ask you to remove the Eklutna Dam to fully reconnect the river and return the water flows needed to support the river's fisheries. I understand the reliance on this hydroelectric energy source in the near-term, and the proposal to remove the Eklutna Lake dam within the next decade, when replacement renewable energy is expected to be available, is reasonable. I also appreciate that community partners are willing to pitch in to help offset costs of the dam removal – taking advantage of this opportunity seems like a fiscally smart decision. The Native Village of Eklutna has clearly communicated their vision for thriving wild salmon in the Eklutna River, including Eklutna Lake and headwater tributaries. Your ratepayers and many Alaskans support this vision. The Eklutna Hydroelectric Project deprives the Eklutna River of water and blocks salmon from migrating in and out of Eklutna Lake. Salmon populations will not recover without a reliable and consistent supply of water and access to important up-stream spawning and rearing areas. This is particularly true for sockeye salmon, if they cannot access Eklutna Lake and its tributaries. CEA, MEA and MOA cannot meet their mitigation obligations within their budget constraints with anything less than removing the dam. Now is your one chance to make this right. Now is your chance to invest in a river that Alaskans can be proud of and help show the world that Anchorage does not just love our salmon, we know what it takes to care for them and actively work to bring them back.

Submitted by:

Name	Date	Area of Residence
Jarod Norton	2/19/2024	Service Area
Jessica Ross	2/19/2024	Service Area
Joseph McGurrian	2/19/2024	Service Area
Naomi Bernard	2/19/2024	Service Area
Norman Hoppas	2/19/2024	Service Area
Randy Brannan	2/19/2024	Service Area
William Aubrey	2/19/2024	Service Area

The Alaska Center Form Letter

Dear Owners of The Eklutna Hydroelectric Project,

This comment is in regard to the Eklutna Hydroelectric Project's Draft Fish and Wildlife Program for the Eklutna River. I do not believe the plan's proposal to utilize the existing Anchorage Water and Wastewater Utility (AWWU) water supply infrastructure meets the needs of salmon, the vision of the Eklutna Peoples, or your legal obligation to mitigate the project's impact on fish and wildlife. I support the Native Village of Eklutna's vision for river restoration and ask you to consider dam removal to fully reconnect the river and return the water flows needed to support the river's fisheries.

The current proposal leaves a mile of the river dry, releases only 3% of historical flows, and does not provide fish passage into the lake and upstream habitat. Salmon populations will only recover with a reliable and consistent water supply and access to crucial upstream spawning and rearing areas. This proposal is unacceptable and needs to go further to restore the river's salmon runs.

The Native Village of Eklutna has communicated its vision for thriving wild salmon in the Eklutna River; dam removal is the most effective way to achieve this important goal. I understand the reliance on this hydroelectric energy source in the near term. But removing the Eklutna Lake dam within the next decade, when replacement renewable energy is expected to be available, is reasonable.

Now is your one chance to make this right. Please consider removing the Eklutna Dam so that all five species of salmon can once again return to the river.

Submitted by:

Name	Date	Area of Residence	Name	Date	Area of Residence
Angela Ferrari	1/12/2024	Service Area	Anne Vollertsen	2/18/2024	Service Area
April Woods	1/12/2024	Service Area	Bhargavi Pochi	2/18/2024	Service Area
Dave Harr	1/12/2024	Service Area	Erin Willahan	2/18/2024	Service Area
Janice Laxson	1/12/2024	Service Area	Hannah Gokaslan	2/18/2024	Service Area
Kurtis Jermain	1/12/2024	Service Area	Jocelyn Stanley	2/18/2024	Service Area
Paul Arneson	1/12/2024	Service Area	Kaitlyn Schwalber	2/18/2024	Service Area
Thomas Scott	1/12/2024	Service Area	Katherine Martini	2/18/2024	Service Area
Sharon Whytal	1/13/2024	Service Area	Megan Newcomb	2/18/2024	Service Area
Staci Genet	1/13/2024	Service Area	Molly Brown	2/18/2024	Service Area
Ann Yates	1/14/2024	Service Area	Rachael Schick	2/18/2024	Service Area
Martha Amore	1/15/2024	Service Area	Ryan Terry	2/18/2024	Service Area

Name	Date	Area of Residence	Name	Date	Area of Residence
Caleb Topolinski	1/16/2024	Service Area	Steve Kakaruk	2/18/2024	Service Area
James Apone	1/16/2024	Service Area	Tania M Spurkland	2/18/2024	Service Area
Aubrey Palmer	1/17/2024	Service Area	Ann Rappoport	2/19/2024	Service Area
Estelle Byrnes	1/19/2024	Service Area	Anna Warnock	2/19/2024	Service Area
Keller Friesen	1/19/2024	Service Area	Ari Romberg	2/19/2024	Service Area
Julian Ramirez	1/22/2024	Service Area	Aubrey Wieber	2/19/2024	Service Area
Cynthia Berger	1/25/2024	Service Area	Ben Virgin	2/19/2024	Service Area
Paula Case	1/25/2024	Service Area	Beth Odom	2/19/2024	Service Area
Anna Bosin	1/26/2024	Service Area	Brenda Tyler	2/19/2024	Service Area
beverly williams	1/26/2024	Service Area	Casey Brayton	2/19/2024	Service Area
Christine Wilcox	1/26/2024	Service Area	Dale Gardner	2/19/2024	Service Area
David Harrison	1/26/2024	Service Area	Jocelyn Ciarlone	2/19/2024	Service Area
Diane Wessing	1/26/2024	Service Area	John Dodge	2/19/2024	Service Area
Genevieve Holubik	1/26/2024	Service Area	Kailyn Hooley	2/19/2024	Service Area
Jack Mosby	1/26/2024	Service Area	Kayci Hanson	2/19/2024	Service Area
James Diehl	1/26/2024	Service Area	Kristine Chen	2/19/2024	Service Area
Jamie Shearer	1/26/2024	Service Area	LINDSEY FINNEY	2/19/2024	Service Area
Kaila Pfister	1/26/2024	Service Area	Lisa Peltola	2/19/2024	Service Area
Sheryl Salasky	1/26/2024	Service Area	Liz Dean	2/19/2024	Service Area
Scott Miller	1/27/2024	Service Area	MADDY MAURER	2/19/2024	Service Area
Tami Morrill	1/27/2024	Service Area	Marti Pausback	2/19/2024	Service Area
Wilma Klass	1/27/2024	Service Area	Max Kritzer	2/19/2024	Service Area
Anthony Knowles	1/28/2024	Service Area	Neil Waggoner	2/19/2024	Service Area
J Martin	1/28/2024	Service Area	Rick Marqusee	2/19/2024	Service Area
Adrienne McVey	1/29/2024	Service Area	Steven Poirot	2/19/2024	Service Area
Anastasia Scollon	1/29/2024	Service Area	Susan Salasky	2/19/2024	Service Area
Sarah Juetten	1/29/2024	Service Area	Akiak	1/12/2024	Other Part of Alaska
Bridget Shaughnessy Smith	1/30/2024	Service Area	Dogan Ozkan	1/12/2024	Other Part of Alaska
Erlinda Downing	1/30/2024	Service Area	Maggie King	1/12/2024	Other Part of Alaska
Patrick Solana Walkinshaw	1/30/2024	Service Area	K Murphy+	1/13/2024	Other Part of Alaska
Tana McNeese	1/30/2024	Service Area	Pamela Weaver	1/15/2024	Other Part of Alaska
Christina Livesey	1/31/2024	Service Area	Allegory Smith	1/26/2024	Other Part of Alaska
Rodney Hebert	1/31/2024	Service Area	Deborah Gravel	1/26/2024	Other Part of Alaska
Sandy Middleton	1/31/2024	Service Area	Jim Steffen	1/26/2024	Other Part of Alaska
Audrey Wright	2/1/2024	Service Area	John Neary	1/26/2024	Other Part of Alaska
Catigan West	2/1/2024	Service Area	Kate Persons	1/26/2024	Other Part of Alaska
Donavin Obrien	2/1/2024	Service Area	Luci Beach	1/26/2024	Other Part of Alaska
Jane Krise	2/1/2024	Service Area	Pat Stanley	1/26/2024	Other Part of Alaska
John Seaman	2/1/2024	Service Area	Raylynn Lawless	1/26/2024	Other Part of Alaska

Name	Date	Area of Residence	Name	Date	Area of Residence
Ammie Tremblay	2/2/2024	Service Area	Tara Chrisman	1/26/2024	Other Part of Alaska
Jan Carolyn Hardy	2/2/2024	Service Area	Evelyn Bass	1/27/2024	Other Part of Alaska
Barbara Jones	2/6/2024	Service Area	Lauren Padawer	1/27/2024	Other Part of Alaska
Courtney Moore	2/6/2024	Service Area	Jean Cole	1/29/2024	Other Part of Alaska
Heidi Frost	2/6/2024	Service Area	Susan Baker	2/5/2024	Other Part of Alaska
Ryen Richards	2/6/2024	Service Area	Heather Best	2/6/2024	Other Part of Alaska
Shara Diamond	2/6/2024	Service Area	Judy Jo Matson	2/6/2024	Other Part of Alaska
Steve Frost	2/6/2024	Service Area	Aurora Barnes	2/7/2024	Other Part of Alaska
Walter Tellman	2/6/2024	Service Area	James M Kari	2/7/2024	Other Part of Alaska
Ellen Vande Visse	2/7/2024	Service Area	John Nagel	2/7/2024	Other Part of Alaska
Kary Brinson	2/7/2024	Service Area	Etta Maillard	2/11/2024	Other Part of Alaska
Onica Sprockreeff	2/7/2024	Service Area	Kathy Lenniger	2/12/2024	Other Part of Alaska
Susan Miller	2/8/2024	Service Area	Gail Cheney	2/16/2024	Other Part of Alaska
Theresa Slaven	2/8/2024	Service Area	Linda Fraley	2/16/2024	Other Part of Alaska
Bobby Tucker	2/9/2024	Service Area	Marc Dumas	2/16/2024	Other Part of Alaska
Connie Sumida	2/9/2024	Service Area	Susan Vogt	2/16/2024	Other Part of Alaska
Marcy Melville	2/11/2024	Service Area	Theodore Krieg	2/16/2024	Other Part of Alaska
Argene San Jose	2/13/2024	Service Area	Heather Mirczak	2/17/2024	Other Part of Alaska
Ben Guzman	2/13/2024	Service Area	Anna Laffrey	2/18/2024	Other Part of Alaska
Brannon Johnson	2/13/2024	Service Area	Aaron Brakel	2/19/2024	Other Part of Alaska
Greg Stevens	2/13/2024	Service Area	Christin Swearingen	2/19/2024	Other Part of Alaska
John Lanojan	2/13/2024	Service Area	Dominic Canale	2/19/2024	Other Part of Alaska
Judith Kell	2/13/2024	Service Area	Kenneth Nukwak	2/19/2024	Other Part of Alaska
Karen Glaser	2/13/2024	Service Area	Percy Ballot	2/19/2024	Other Part of Alaska
Kati Paddock	2/13/2024	Service Area	Anita Moore-Nall	1/11/2024	Out of State
Kelly Sandberg	2/13/2024	Service Area	John Roche+	1/13/2024	Out of State
Laura Bartholomew	2/13/2024	Service Area	Annie Porges	1/25/2024	Out of State
Patrice Lecso	2/13/2024	Service Area	Sam Mcfarland	1/25/2024	Out of State
Peter Heninger	2/13/2024	Service Area	Christen Blackburn	1/26/2024	Out of State
Polaris Sullo	2/13/2024	Service Area	Karen Jacques	1/26/2024	Out of State
Rose Khamis	2/13/2024	Service Area	Lauren Letsinger	1/26/2024	Out of State
Zack Yalibula	2/13/2024	Service Area	John Roche	1/27/2024	Out of State
Erica Khan	2/14/2024	Service Area	Susan Hilty	1/30/2024	Out of State
Catherine Campbell	2/15/2024	Service Area	Carrie Johnson	2/6/2024	Out of State
Angie Oberlitner	2/16/2024	Service Area	Jane Heltebrake	2/7/2024	Out of State
Claire Shaw	2/16/2024	Service Area	Michelle Rua	2/7/2024	Out of State
Donald Crandall	2/16/2024	Service Area	Ruby Ackermann	2/7/2024	Out of State
Doug Hill	2/16/2024	Service Area	Kevin Gowers	2/8/2024	Out of State
Jay Laxson	2/16/2024	Service Area	Mike Seyfried	2/8/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Ken Zafren	2/16/2024	Service Area	Victoria Sindlinger	2/8/2024	Out of State
Laurie Daniel	2/16/2024	Service Area	Mark Cummins	2/9/2024	Out of State
Marcia Colson	2/16/2024	Service Area	Sierra Skinner	2/9/2024	Out of State
Mckenzy Johnson	2/16/2024	Service Area	Laura Krause	2/11/2024	Out of State
Rebecca Marks	2/16/2024	Service Area	line lie	2/12/2024	Out of State
Richard Rothstein	2/16/2024	Service Area	Angie Francis	2/16/2024	Out of State
Richard Wollenberg	2/16/2024	Service Area	Diana Gries	2/16/2024	Out of State
Rick Oldham	2/16/2024	Service Area	janna piper	2/16/2024	Out of State
Sharon Bissell Eddy	2/16/2024	Service Area	Patti Blevins	2/16/2024	Out of State
Terry S Johnson	2/16/2024	Service Area	alexis politz	2/17/2024	Out of State
Zoe Seppi	2/16/2024	Service Area	Gavin Siegert	2/17/2024	Out of State
Anna Wen	2/17/2024	Service Area	Gillian Britton	2/17/2024	Out of State
Beau Feckley	2/17/2024	Service Area	Jennifer Johnston	2/17/2024	Out of State
BOB STANDISH	2/17/2024	Service Area	Jorge Palacios	2/17/2024	Out of State
Cami Dalton	2/17/2024	Service Area	Kikken Schleusner	2/17/2024	Out of State
Charlie Lowell	2/17/2024	Service Area	Michelle DuBray	2/17/2024	Out of State
Cheryl Hickson	2/17/2024	Service Area	Owen Fitz	2/17/2024	Out of State
Elizabeth Besseney	2/17/2024	Service Area	Shay L	2/17/2024	Out of State
Hayley Cavitt	2/17/2024	Service Area	Coco Percival	2/18/2024	Out of State
Jasmine Redgrave	2/17/2024	Service Area	Debbie Ruiz	2/18/2024	Out of State
Kenneth Pysz	2/17/2024	Service Area	Diane Weisman	2/18/2024	Out of State
Lori Stephenson	2/17/2024	Service Area	Helen Watts	2/18/2024	Out of State
Rika Mouw	2/17/2024	Service Area	Ja Trussell	2/18/2024	Out of State
Sandy Harper	2/17/2024	Service Area	Maggie Chapin Chapin	2/18/2024	Out of State
Toshio Matsuoka	2/17/2024	Service Area	Rachael Rappoport	2/18/2024	Out of State
Wendy C Baker	2/17/2024	Service Area	Angela Dennis	2/19/2024	Out of State
Willow Feighery	2/17/2024	Service Area	Celia Darling	2/19/2024	Out of State
Adrienne Fleek	2/18/2024	Service Area	Fayette Krause	2/19/2024	Out of State
Allison Griffith	2/18/2024	Service Area	Lydia Lemon	2/19/2024	Out of State
Brian Himelbloom	2/19/2024	Out of Service Area			

Salmon State Form Letter

Dear Operators of the Eklutna Hydroelectric Project,

Thank you for the opportunity to comment on the draft Fish and Wildlife Plan proposed for the Eklutna River. Thriving salmon runs are essential to the majority of Alaskans — whether as a source of income, a way to practice culture or a way of filling the freezer. Unfortunately, the Eklutna River has been disrupted for nearly 70 years, causing salmon to significantly struggle, impacting the Peoples of Eklutna and Southcentral residents. The proposed plan, unfortunately, omits a complete mile between the lake and the portal valve which would continue to prohibit salmon from returning to the lake and upper tributaries to spawn. The plan would also fail to return the river to its historic flow levels, further impacting habitat and wildlife.

I strongly urge you to heed the recommendations of the Native Village of Eklutna to remove the dam and fully restore the Eklutna River. Not only would removing the dam restore salmon to the river, it would avoid financially burdening utility ratepayers and MOA taxpayers with a short-term, insufficient plan. Instead, the dam removal costs could be covered by two nonprofit organizations who have agreed to pay for it.

You have the opportunity to be leaders in learning from historic mistakes of damming rivers, in restoring a wild salmon run, and in righting a historic wrong on the Eklutna River.

Submitted by:

Name	Date	Area of Residence	Name	Date	Area of Residence
Andrew Andrew	1/19/2024	Service Area	Carol Kasza	1/19/2024	Other Part of Alaska
Kevin Scott	1/19/2024	Service Area	Christine Everett	1/20/2024	Other Part of Alaska
Ryan Astalos	1/19/2024	Service Area	Fred C Freer	1/20/2024	Other Part of Alaska
Allen Dahl	1/20/2024	Service Area	John Hudson	1/20/2024	Other Part of Alaska
Barry Santana	1/20/2024	Service Area	Lynn Wilbur	1/20/2024	Other Part of Alaska
Dave Nelson	1/20/2024	Service Area	Michael Garcia	1/20/2024	Other Part of Alaska
Georgian Nils	1/20/2024	Service Area	Karen Walker	1/21/2024	Other Part of Alaska
Guy Lopez	1/20/2024	Service Area	Stian Stensland	1/21/2024	Other Part of Alaska
Robert Vernon	1/20/2024	Service Area	Marie Katcheak	1/22/2024	Other Part of Alaska
Terry Cummings	1/20/2024	Service Area	Tisa Becker	1/29/2024	Other Part of Alaska
Marika Hintz	1/21/2024	Service Area	Sam Marchant	1/30/2024	Other Part of Alaska
Timothy Weglarz	1/22/2024	Service Area	Mary Martin	2/2/2024	Other Part of Alaska
Stephanie Foley	1/24/2024	Service Area	Erik Kokborg	2/3/2024	Other Part of Alaska
Rachel Zander	1/30/2024	Service Area	Ellen Americus	2/13/2024	Other Part of Alaska
J Lhesli Benedict	2/3/2024	Service Area	Audrey Y	2/17/2024	Other Part of Alaska

Name	Date	Area of Residence	Name	Date	Area of Residence
Jessica Anaruk	2/4/2024	Service Area	Carol Race	2/17/2024	Other Part of Alaska
Fia Chaney	2/10/2024	Service Area	Carrie Dodson	2/17/2024	Other Part of Alaska
Francis Cruise	2/10/2024	Service Area	Casimir Abramczyk	2/17/2024	Other Part of Alaska
Morris Horning	2/10/2024	Service Area	Chiara Rose	2/17/2024	Other Part of Alaska
Jade Haggard	2/13/2024	Service Area	Deb Corso	2/17/2024	Other Part of Alaska
Paul Zimmerman	2/13/2024	Service Area	Francine Brown	2/17/2024	Other Part of Alaska
Russell Hathaway	2/14/2024	Service Area	Gretchen Randolph	2/17/2024	Other Part of Alaska
Troy Hart	2/14/2024	Service Area	Jos Bakker	2/17/2024	Other Part of Alaska
Sean Tisch	2/16/2024	Service Area	Judy Palmer	2/17/2024	Other Part of Alaska
Sue Maurice	2/16/2024	Service Area	Lois Booth	2/17/2024	Other Part of Alaska
Dale Kaercher	2/17/2024	Service Area	Luann McVey	2/17/2024	Other Part of Alaska
David Allen	2/17/2024	Service Area	Nancy Waterman	2/17/2024	Other Part of Alaska
Davin Holen	2/17/2024	Service Area	Nathaniel Perry	2/17/2024	Other Part of Alaska
Deacon Bradley	2/17/2024	Service Area	Samuel McBeen	2/17/2024	Other Part of Alaska
Dulce Ben-East	2/17/2024	Service Area	Corinne Ferre	2/18/2024	Other Part of Alaska
Jared Becker	2/17/2024	Service Area	Jamiann Hasselquist	2/18/2024	Other Part of Alaska
Jason Bontrager	2/17/2024	Service Area	China Kantner	2/19/2024	Other Part of Alaska
John Hoopes	2/17/2024	Service Area	Fred - C Freer	2/19/2024	Other Part of Alaska
Kimberly Killion	2/17/2024	Service Area	marie hurd	2/19/2024	Other Part of Alaska
Lee Stark	2/17/2024	Service Area	Blaise Brockman	2/17/2024	Out of State
Mariza Tovar	2/17/2024	Service Area	Boyce Sherwin	2/17/2024	Out of State
Mark Niver	2/17/2024	Service Area	brad smith	2/17/2024	Out of State
Morgan MacConaugha	2/17/2024	Service Area	Brandi McCauley	2/17/2024	Out of State
Randy Paddock	2/17/2024	Service Area	Brenda Smith	2/17/2024	Out of State
Steven Bergt	2/17/2024	Service Area	Brian Conover	2/17/2024	Out of State
Carmen Bydalek	2/18/2024	Service Area	Brian Gingras	2/17/2024	Out of State
Claudia Jacobson	2/18/2024	Service Area	Candy Bowman	2/17/2024	Out of State
Marilyn Heiman	2/18/2024	Service Area	Carl Stapler	2/17/2024	Out of State
Mark Jacobson	2/18/2024	Service Area	Carla Tuke	2/17/2024	Out of State
Nicholas Cassara	2/18/2024	Service Area	Carol HILTON	2/17/2024	Out of State
Sandra Tompkins	2/18/2024	Service Area	Caroline Armon	2/17/2024	Out of State
Stephen Sims	2/18/2024	Service Area	carolyn fischer	2/17/2024	Out of State
Janice Banta	2/19/2024	Service Area	Catherine McNamara	2/17/2024	Out of State
Jessic Winnestaffer	2/19/2024	Service Area	Catherine Morris	2/17/2024	Out of State
JoAnn Bennett-Brown	2/19/2024	Service Area	Catherine Williams	2/17/2024	Out of State
Nadine Doiron	2/19/2024	Service Area	Charlene Woodcock	2/17/2024	Out of State
Terri Leman	2/19/2024	Service Area	Charles Hammerstad	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
August Ashmun	1/19/2024	Out of State	Charles Spreter	2/17/2024	Out of State
Julie Buchenau	1/19/2024	Out of State	Cherine Bauer	2/17/2024	Out of State
Lisa Mascho	1/19/2024	Out of State	Cheryl Vana	2/17/2024	Out of State
AJ Cho	1/20/2024	Out of State	Cheryl Watters	2/17/2024	Out of State
Alan Bedard	1/20/2024	Out of State	Chris Calvert	2/17/2024	Out of State
Alice Gard	1/20/2024	Out of State	Christine Kiefer	2/17/2024	Out of State
Amanda Dickinson	1/20/2024	Out of State	Cindy Grimes	2/17/2024	Out of State
Ann Sandritter	1/20/2024	Out of State	Claudia McNulty	2/17/2024	Out of State
Anthony Albert	1/20/2024	Out of State	Clayton Jones	2/17/2024	Out of State
Antje Fray	1/20/2024	Out of State	Clive O'Donoghue	2/17/2024	Out of State
Barbara Harper	1/20/2024	Out of State	Colleen Cleary	2/17/2024	Out of State
Barclay Hauber	1/20/2024	Out of State	Colleen Rodger	2/17/2024	Out of State
Beth Darlington	1/20/2024	Out of State	Constance Secaras	2/17/2024	Out of State
Bonita Staas	1/20/2024	Out of State	Cynthia Edwards	2/17/2024	Out of State
Brenda Hartman	1/20/2024	Out of State	Cynthia Liss	2/17/2024	Out of State
Bridgett Heinly	1/20/2024	Out of State	Dan Heffernan	2/17/2024	Out of State
Bruce Troutman	1/20/2024	Out of State	Dan Larson	2/17/2024	Out of State
Camille Gilbert	1/20/2024	Out of State	danny james	2/17/2024	Out of State
cara artman	1/20/2024	Out of State	Darlene Falk	2/17/2024	Out of State
Carol Book	1/20/2024	Out of State	David Edwards	2/17/2024	Out of State
Carol Else	1/20/2024	Out of State	Deb Hirt	2/17/2024	Out of State
Caroline Sévilla	1/20/2024	Out of State	Debora Hojda	2/17/2024	Out of State
Carolyn Nieland	1/20/2024	Out of State	Deborah Lane	2/17/2024	Out of State
Carolyn Ryan	1/20/2024	Out of State	Debra Smith	2/17/2024	Out of State
Cathy Barton	1/20/2024	Out of State	Del Stiewert	2/17/2024	Out of State
Charlie Burns	1/20/2024	Out of State	Derek Gendvil	2/17/2024	Out of State
Chris Guillory	1/20/2024	Out of State	Desiree Nagyfy	2/17/2024	Out of State
Christina Davis	1/20/2024	Out of State	Devorah Soodak	2/17/2024	Out of State
Cinda Johansen	1/20/2024	Out of State	Donald Taylor	2/17/2024	Out of State
Cindy Shoaf	1/20/2024	Out of State	Donna Barrett	2/17/2024	Out of State
Darlene Jakusz	1/20/2024	Out of State	Donna Bonetti	2/17/2024	Out of State
Darlene Wolf	1/20/2024	Out of State	Donna Hreha	2/17/2024	Out of State
Dave Searles	1/20/2024	Out of State	Doug Koffler	2/17/2024	Out of State
Debra Kern	1/20/2024	Out of State	Dr Jo Jones	2/17/2024	Out of State
Donna Selquist	1/20/2024	Out of State	Ed Fiedler	2/17/2024	Out of State
Felicity Hohenshelt	1/20/2024	Out of State	Edward Bielaus	2/17/2024	Out of State
Francelia Lieurance	1/20/2024	Out of State	Elaine Livingston	2/17/2024	Out of State
Frances Blythe	1/20/2024	Out of State	Elisa Townshend	2/17/2024	Out of State
fred rilling	1/20/2024	Out of State	Elisabeth Armendarez	2/17/2024	Out of State
Gary Gover	1/20/2024	Out of State	Elizabeth Butler	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
George Craciun	1/20/2024	Out of State	elizabeth darovic	2/17/2024	Out of State
Gerald Hallead	1/20/2024	Out of State	Elizabeth Meszaros	2/17/2024	Out of State
Gerry Milliken	1/20/2024	Out of State	Elizabeth Watts	2/17/2024	Out of State
Gudrun Dennis	1/20/2024	Out of State	Ellen Dryer	2/17/2024	Out of State
Heide Coppotelli	1/20/2024	Out of State	Eric Nylen	2/17/2024	Out of State
heidi ahlstrand	1/20/2024	Out of State	eric voorhies	2/17/2024	Out of State
Henry Berkowitz	1/20/2024	Out of State	Eric West	2/17/2024	Out of State
I Engle	1/20/2024	Out of State	erin garcia	2/17/2024	Out of State
Jackie Stolfi	1/20/2024	Out of State	Florence Harty	2/17/2024	Out of State
Jacquelyn Sidor	1/20/2024	Out of State	Fred Granlund	2/17/2024	Out of State
james hatchett	1/20/2024	Out of State	Frederique Joly	2/17/2024	Out of State
Jamie Green	1/20/2024	Out of State	Gary Thaler	2/17/2024	Out of State
Jana Harter	1/20/2024	Out of State	gary zahler	2/17/2024	Out of State
Jane Nachazel-Ruck	1/20/2024	Out of State	Gavin Bornholtz	2/17/2024	Out of State
Jared Brenner	1/20/2024	Out of State	Genny Hoyle	2/17/2024	Out of State
Jarrett Cloud	1/20/2024	Out of State	George Burnash	2/17/2024	Out of State
Jennifer Valentine	1/20/2024	Out of State	George Mackison	2/17/2024	Out of State
JL Angell	1/20/2024	Out of State	Gloria Picchetti	2/17/2024	Out of State
John Oda	1/20/2024	Out of State	Gloria Uribe	2/17/2024	Out of State
Johnny Hall	1/20/2024	Out of State	Grace Strong	2/17/2024	Out of State
Jonathan Hancock	1/20/2024	Out of State	Gregory Holtzapple	2/17/2024	Out of State
jonette bronson	1/20/2024	Out of State	Guy Taylor	2/17/2024	Out of State
Joseph Ponisciak	1/20/2024	Out of State	Harry Gerecke	2/17/2024	Out of State
Joy Kroeger-Mappes	1/20/2024	Out of State	Harry Knapp	2/17/2024	Out of State
Judy Moran	1/20/2024	Out of State	Heather LeBlanc	2/17/2024	Out of State
K Danowski	1/20/2024	Out of State	Heather Ruckman	2/17/2024	Out of State
Karen Kawszan	1/20/2024	Out of State	Helen Fisher	2/17/2024	Out of State
Karen Peterson	1/20/2024	Out of State	Helmut Kothbauer	2/17/2024	Out of State
Katherine Wright	1/20/2024	Out of State	Hiedi Tan	2/17/2024	Out of State
Kathryn Rose	1/20/2024	Out of State	Hunter Wallof	2/17/2024	Out of State
Kathy Bradley	1/20/2024	Out of State	I Engle	2/17/2024	Out of State
Kathy Dabanian	1/20/2024	Out of State	Ian Shelley	2/17/2024	Out of State
Kenneth Payne	1/20/2024	Out of State	Irini Dieringer	2/17/2024	Out of State
Kent Iverson	1/20/2024	Out of State	J Anderson	2/17/2024	Out of State
Kicab Castaneda-Mend	1/20/2024	Out of State	J W Andes	2/17/2024	Out of State
Laura Chinofsky	1/20/2024	Out of State	Jack Dodson	2/17/2024	Out of State
Laura Herndon	1/20/2024	Out of State	Jack H McCall Jr	2/17/2024	Out of State
Laura Long	1/20/2024	Out of State	Jack Steinberg	2/17/2024	Out of State
Lee Fister	1/20/2024	Out of State	James Herther	2/17/2024	Out of State
Linda Fowler	1/20/2024	Out of State	James Patton	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Linda Headley	1/20/2024	Out of State	James Wee	2/17/2024	Out of State
Linda Luke	1/20/2024	Out of State	Jamie Le	2/17/2024	Out of State
Linda Prostko	1/20/2024	Out of State	Jane Gulley	2/17/2024	Out of State
Linda Vopicka	1/20/2024	Out of State	Jane Wiley	2/17/2024	Out of State
Lori Erbs	1/20/2024	Out of State	Janet Moser	2/17/2024	Out of State
Malcolm Simpson	1/20/2024	Out of State	Janine Kondreck	2/17/2024	Out of State
Marce Walsh	1/20/2024	Out of State	Jason Crawford	2/17/2024	Out of State
Marilynn Harper	1/20/2024	Out of State	Jean Hanson	2/17/2024	Out of State
Mark Klugiewicz	1/20/2024	Out of State	Jean Van Nest	2/17/2024	Out of State
Martha Gorak	1/20/2024	Out of State	Jennifer Layton	2/17/2024	Out of State
Mary Puglia	1/20/2024	Out of State	Jerry Banks	2/17/2024	Out of State
Maureen Zilner Palla	1/20/2024	Out of State	Jerry Fitzgerald	2/17/2024	Out of State
Meg Gilman	1/20/2024	Out of State	Jesse Kirkham	2/17/2024	Out of State
Meryle A Korn	1/20/2024	Out of State	Jewell Batway	2/17/2024	Out of State
Michael Brandes	1/20/2024	Out of State	Jill Nicholas	2/17/2024	Out of State
Michael Garitty	1/20/2024	Out of State	JL Charrier	2/17/2024	Out of State
Michael Lombardi	1/20/2024	Out of State	Joan M Cummings	2/17/2024	Out of State
Miriam Baum	1/20/2024	Out of State	Joan Oosterwyk	2/17/2024	Out of State
Ms Zentura	1/20/2024	Out of State	Joann Koch	2/17/2024	Out of State
Nancy White	1/20/2024	Out of State	Jody Lewis	2/17/2024	Out of State
Naomi Klass	1/20/2024	Out of State	Jody Mahnken	2/17/2024	Out of State
Nellie Medlin	1/20/2024	Out of State	John Alder	2/17/2024	Out of State
Nicola Nicolai	1/20/2024	Out of State	John Andes	2/17/2024	Out of State
Nina Kornstein	1/20/2024	Out of State	JOHN LEONARD	2/17/2024	Out of State
Patty Duffy	1/20/2024	Out of State	Joseph M Varon	2/17/2024	Out of State
Paul Hunrichs	1/20/2024	Out of State	Joyce Lahna	2/17/2024	Out of State
Paul Kalka	1/20/2024	Out of State	Judy Brewer	2/17/2024	Out of State
Paula Neville	1/20/2024	Out of State	Julia Cranmer	2/17/2024	Out of State
priscilla martinez	1/20/2024	Out of State	Karen Milstein	2/17/2024	Out of State
PROTECT All Things Wild and Wonderful	1/20/2024	Out of State	Karen Spradlin	2/17/2024	Out of State
Rev Carole Ann Cole	1/20/2024	Out of State	Kat Bowley	2/17/2024	Out of State
Robin Blakesley	1/20/2024	Out of State	Kathleen Shabi	2/17/2024	Out of State
Sam Butler	1/20/2024	Out of State	Kathy Jackson	2/17/2024	Out of State
Sandra Couch	1/20/2024	Out of State	KENNETH KRYNICKI	2/17/2024	Out of State
Sarah Hafer	1/20/2024	Out of State	Kevin Vaught	2/17/2024	Out of State
Scott Gorn	1/20/2024	Out of State	Kicab Castaneda-Mendez	2/17/2024	Out of State
Scott Korman	1/20/2024	Out of State	Kristin Bryant	2/17/2024	Out of State
Sharon Longyear	1/20/2024	Out of State	Lance Kammerud	2/17/2024	Out of State
Stacey Cannon	1/20/2024	Out of State	Larry Bogolub	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Stefan Taylor	1/20/2024	Out of State	Laura Taylor	2/17/2024	Out of State
Stephen Owen	1/20/2024	Out of State	Linda Freeman	2/17/2024	Out of State
Steve Berman	1/20/2024	Out of State	Linda McKillip	2/17/2024	Out of State
Thomas Nieland	1/20/2024	Out of State	Lindsey Diamond	2/17/2024	Out of State
Thomas Ray	1/20/2024	Out of State	Lisa Ann Kelly	2/17/2024	Out of State
Tina Ann	1/20/2024	Out of State	Lyn Lowry	2/17/2024	Out of State
Trigg Wright	1/20/2024	Out of State	Lynn Shoemaker	2/17/2024	Out of State
Vic Bostock	1/20/2024	Out of State	Lynn Welch	2/17/2024	Out of State
Vicki Wheeler	1/20/2024	Out of State	Malcolm Elgut	2/17/2024	Out of State
Victoria hall	1/20/2024	Out of State	Manfred Zanger	2/17/2024	Out of State
Victoria Urias	1/20/2024	Out of State	Marc And Alice Imlay	2/17/2024	Out of State
Virginia Davis	1/20/2024	Out of State	Margaret Chasson	2/17/2024	Out of State
Wayne Laubscher	1/20/2024	Out of State	Margaret Silver	2/17/2024	Out of State
William Obrien	1/20/2024	Out of State	Margaretha Hertle	2/17/2024	Out of State
William Tarbox	1/20/2024	Out of State	Margarita Perez	2/17/2024	Out of State
AnnMarie Sardineer	1/21/2024	Out of State	Maria Nowicki	2/17/2024	Out of State
Asam Cuthriell	1/21/2024	Out of State	Marie Wakefield	2/17/2024	Out of State
Dennis Landi	1/21/2024	Out of State	Mark Hollinrake	2/17/2024	Out of State
Harold Tipping	1/21/2024	Out of State	Marsha Lowry	2/17/2024	Out of State
Helen Nickerson	1/21/2024	Out of State	Martin Marcus	2/17/2024	Out of State
Jessica Taliaferro	1/21/2024	Out of State	Maryanne Jerome	2/17/2024	Out of State
John Curotto	1/21/2024	Out of State	Maureen Rogers	2/17/2024	Out of State
Marianne Lazarus	1/21/2024	Out of State	Melvin Hughes	2/17/2024	Out of State
Marion Kraus	1/21/2024	Out of State	Merna Baker Blagg	2/17/2024	Out of State
Mary Johnson	1/21/2024	Out of State	Meryle A Korn	2/17/2024	Out of State
Maryon Hatter	1/21/2024	Out of State	Michael Madden	2/17/2024	Out of State
Pam Brocious	1/21/2024	Out of State	Michael R Watson	2/17/2024	Out of State
Paul Moss	1/21/2024	Out of State	Michele Johnson	2/17/2024	Out of State
Paula Morgan	1/21/2024	Out of State	Mike Mahler	2/17/2024	Out of State
Richard Peterson	1/21/2024	Out of State	Nan Beatty	2/17/2024	Out of State
Robert Bergan	1/21/2024	Out of State	Nedra Carroll	2/17/2024	Out of State
Stephen Gliva	1/21/2024	Out of State	Norm Wilmes	2/17/2024	Out of State
Candace Rocha	1/22/2024	Out of State	Norman Baker	2/17/2024	Out of State
Colette Bennett	1/22/2024	Out of State	Pamela Kane	2/17/2024	Out of State
Diane Shifrin	1/22/2024	Out of State	Pat WOLONGEVICZ	2/17/2024	Out of State
L M	1/22/2024	Out of State	Patricia Auer	2/17/2024	Out of State
Patti Packer	1/22/2024	Out of State	Patricia Blackwell- Marchant	2/17/2024	Out of State
Trinidad Lopez	1/22/2024	Out of State	Patricia Burton	2/17/2024	Out of State
Joseph Wenzel	1/23/2024	Out of State	Patricia Martinez	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Pauline Kahney	1/23/2024	Out of State	Pete Sullivan	2/17/2024	Out of State
Ken Snford	1/24/2024	Out of State	Phil DJernes	2/17/2024	Out of State
Janet Forman	1/25/2024	Out of State	Phyllis Corcacas	2/17/2024	Out of State
Robert Moore	1/27/2024	Out of State	Pris Wright	2/17/2024	Out of State
s cook	1/27/2024	Out of State	Quinton Moto	2/17/2024	Out of State
C Yee	1/28/2024	Out of State	Rachael Denny	2/17/2024	Out of State
Ellen Gutfleisch	1/28/2024	Out of State	Rebecca Evans	2/17/2024	Out of State
Kaitlin Fitch	1/28/2024	Out of State	Rich Speer	2/17/2024	Out of State
Wendy Niemeyer	1/28/2024	Out of State	Richard McNulty	2/17/2024	Out of State
Ariel Buback	1/29/2024	Out of State	Richard Ohlendorf	2/17/2024	Out of State
Amy Grondin	1/30/2024	Out of State	Robert Cherwink	2/17/2024	Out of State
Christina Henning	1/30/2024	Out of State	Robert Cobb	2/17/2024	Out of State
Daniel OBrien	1/30/2024	Out of State	Robert Gibb	2/17/2024	Out of State
Jean Chagnon	1/30/2024	Out of State	Robert Giusti	2/17/2024	Out of State
Kurt Harvey	1/30/2024	Out of State	Roberta Kessler	2/17/2024	Out of State
Amber Locke	1/31/2024	Out of State	Roger Schmidt	2/17/2024	Out of State
Phillip O'Neil	1/31/2024	Out of State	Ronald Bogin	2/17/2024	Out of State
Cade Cannon	2/1/2024	Out of State	Ronald Meredith	2/17/2024	Out of State
Ann Stratten	2/3/2024	Out of State	Ronald Silver	2/17/2024	Out of State
Annie McCombs	2/3/2024	Out of State	Roth Woods	2/17/2024	Out of State
April Narcisse	2/3/2024	Out of State	Roy Ferguson	2/17/2024	Out of State
Barbara Jacobsen	2/3/2024	Out of State	Russell Weisz	2/17/2024	Out of State
Bob Gendron	2/3/2024	Out of State	Sam Rushforth	2/17/2024	Out of State
Bob-Marie Rayburn	2/3/2024	Out of State	Sandi Covell	2/17/2024	Out of State
Bonnie Brooks	2/3/2024	Out of State	Sandra Breakfield	2/17/2024	Out of State
Brian Yanke	2/3/2024	Out of State	Sandraa Varvel	2/17/2024	Out of State
Carmen Blakely	2/3/2024	Out of State	Sarah Sederstrom	2/17/2024	Out of State
Carol Collins	2/3/2024	Out of State	Scott Davis	2/17/2024	Out of State
Cathy Thomas	2/3/2024	Out of State	Scott Emsley	2/17/2024	Out of State
DANIEL HENLING	2/3/2024	Out of State	Sharon Baker	2/17/2024	Out of State
Dennis Schaef	2/3/2024	Out of State	Sheila Nolte	2/17/2024	Out of State
E Neal	2/3/2024	Out of State	Shelley Hartz	2/17/2024	Out of State
Emily Van Alyne	2/3/2024	Out of State	Shirley McCarthy	2/17/2024	Out of State
Evelyn Parker	2/3/2024	Out of State	Stefon Lira	2/17/2024	Out of State
fay forman	2/3/2024	Out of State	Stephan Donovan	2/17/2024	Out of State
Garrick Balk	2/3/2024	Out of State	Stephanie Huntington	2/17/2024	Out of State
gisela zech	2/3/2024	Out of State	Stephanie Marsicovetere	2/17/2024	Out of State
Harold Watson	2/3/2024	Out of State	Steve Keim	2/17/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Howard Cohen	2/3/2024	Out of State	Steven Andrychowski	2/17/2024	Out of State
Janet Funicelli	2/3/2024	Out of State	Stewart Wilber	2/17/2024	Out of State
Joan Smith	2/3/2024	Out of State	Sue Denker	2/17/2024	Out of State
Joyce Frohn	2/3/2024	Out of State	Sue Hall	2/17/2024	Out of State
Judith Smith	2/3/2024	Out of State	Susan Delles	2/17/2024	Out of State
laura glenn	2/3/2024	Out of State	Susan Dorchin	2/17/2024	Out of State
Les Roberts	2/3/2024	Out of State	SUSAN GALANTE	2/17/2024	Out of State
Linda Seaver	2/3/2024	Out of State	Susan Porter	2/17/2024	Out of State
Marcella Crane	2/3/2024	Out of State	Susan Querze	2/17/2024	Out of State
Margaret Guilfooy Tyler	2/3/2024	Out of State	Susan Worden	2/17/2024	Out of State
Mary Gershanoff	2/3/2024	Out of State	Suzanne Becket	2/17/2024	Out of State
Meryl Pinque	2/3/2024	Out of State	Sydnee Thompson	2/17/2024	Out of State
RedElisa Mendoza	2/3/2024	Out of State	Sylvia O	2/17/2024	Out of State
Ruth Boice	2/3/2024	Out of State	Tania Malven	2/17/2024	Out of State
Sandy Zelasko	2/3/2024	Out of State	Theresa Hebron	2/17/2024	Out of State
Stephen Blakely	2/3/2024	Out of State	Thom Peters	2/17/2024	Out of State
Susan Thompson	2/3/2024	Out of State	Tim Butler	2/17/2024	Out of State
Thomasin Kellermann	2/3/2024	Out of State	Tim Quirante	2/17/2024	Out of State
Tracy Ouellette	2/3/2024	Out of State	Tony Fanucci	2/17/2024	Out of State
Jennifer Smith	2/4/2024	Out of State	Torunn Sivesind	2/17/2024	Out of State
Karen Naiman	2/4/2024	Out of State	tosh myers	2/17/2024	Out of State
Kent John Clark	2/4/2024	Out of State	Vicki Warner-Huggins	2/17/2024	Out of State
Mary Rivas	2/5/2024	Out of State	Vincent Rusch	2/17/2024	Out of State
Rachael Pappano	2/5/2024	Out of State	Virginia Dwyer	2/17/2024	Out of State
Tia Simon	2/5/2024	Out of State	Warwick Hansell	2/17/2024	Out of State
Jennifer Nitz	2/6/2024	Out of State	Wayne Steffes	2/17/2024	Out of State
A L Steiner	2/10/2024	Out of State	Whitney Watters	2/17/2024	Out of State
Alice Polesky	2/10/2024	Out of State	William Buchan	2/17/2024	Out of State
B Z	2/10/2024	Out of State	William Kuhl	2/17/2024	Out of State
Betsy Wolf	2/10/2024	Out of State	Zieh Fink	2/17/2024	Out of State
Betty Winholtz	2/10/2024	Out of State	Alexa McMahan	2/18/2024	Out of State
Bob Rayburn	2/10/2024	Out of State	Amanda Miller	2/18/2024	Out of State
Brenda Psaras	2/10/2024	Out of State	Andy Hughes	2/18/2024	Out of State
Carrie Swank	2/10/2024	Out of State	Anna Cruikshank	2/18/2024	Out of State
Chris R	2/10/2024	Out of State	Anna Tangi	2/18/2024	Out of State
Cynthia Hull	2/10/2024	Out of State	Bob Winslow	2/18/2024	Out of State
David Bryan	2/10/2024	Out of State	Bonnie G Brooks	2/18/2024	Out of State
David Worley	2/10/2024	Out of State	Carole Ann Cole	2/18/2024	Out of State
Debra Miller	2/10/2024	Out of State	Cathie Kwasneski	2/18/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
doug krause	2/10/2024	Out of State	David Meade	2/18/2024	Out of State
Georgia Shankel	2/10/2024	Out of State	Debra Rehn	2/18/2024	Out of State
Geraldine Card	2/10/2024	Out of State	Denise Shapiro	2/18/2024	Out of State
Greg Kimball	2/10/2024	Out of State	Diana Duffy	2/18/2024	Out of State
Greg Sells	2/10/2024	Out of State	Diana Soleil	2/18/2024	Out of State
Jamie Shields	2/10/2024	Out of State	Erline Towner	2/18/2024	Out of State
Jennifer Brandon	2/10/2024	Out of State	Fanny Whitman	2/18/2024	Out of State
Jennifer Schally	2/10/2024	Out of State	Gloria Morrison	2/18/2024	Out of State
Jerry Rivers	2/10/2024	Out of State	Holly Crawford	2/18/2024	Out of State
John Doucette	2/10/2024	Out of State	janet romine	2/18/2024	Out of State
Jordan Glass	2/10/2024	Out of State	Janice Wilfing	2/18/2024	Out of State
Joseph Slaven	2/10/2024	Out of State	John Papandrea	2/18/2024	Out of State
Kathleen O'Connell	2/10/2024	Out of State	John Ruhl	2/18/2024	Out of State
Kenneth Lapointe	2/10/2024	Out of State	Judith Dawn Silver	2/18/2024	Out of State
Linda Granato	2/10/2024	Out of State	Judith Falck-Madsen	2/18/2024	Out of State
Linda Myers	2/10/2024	Out of State	Kjersten Gmeiner	2/18/2024	Out of State
Linda Thompson	2/10/2024	Out of State	Lauren Richie	2/18/2024	Out of State
Linda Walters	2/10/2024	Out of State	Leslie Spurling	2/18/2024	Out of State
Lisa Koehl	2/10/2024	Out of State	Lora Steiner	2/18/2024	Out of State
Melissa Cathcart	2/10/2024	Out of State	Marie Garescher	2/18/2024	Out of State
Michelle Collar	2/10/2024	Out of State	Maureen McCullough	2/18/2024	Out of State
Nezka Pfeifer	2/10/2024	Out of State	Maurene Conway	2/18/2024	Out of State
Rollin Blanton	2/10/2024	Out of State	Michael McMahan	2/18/2024	Out of State
Ron Faich	2/10/2024	Out of State	Michele LaPorte	2/18/2024	Out of State
Ruth Clifford	2/10/2024	Out of State	Michele Nihipali	2/18/2024	Out of State
Sabrina Eckles	2/10/2024	Out of State	Mike and Susan Gail Raymond	2/18/2024	Out of State
Sarah Stewart	2/10/2024	Out of State	Patrick De La Garza Und Senkel	2/18/2024	Out of State
Stephen Dutschke	2/10/2024	Out of State	Pearl Spiro	2/18/2024	Out of State
SUSAN BABBITT	2/10/2024	Out of State	Phyllis Chavez	2/18/2024	Out of State
tucker valovic	2/10/2024	Out of State	Richard Tidd	2/18/2024	Out of State
Virgene Link-New	2/10/2024	Out of State	Rickey Buttery	2/18/2024	Out of State
Bernadette Webster	2/11/2024	Out of State	ROBERT CURTIN	2/18/2024	Out of State
Doug Gledhill	2/11/2024	Out of State	Sandra Materi	2/18/2024	Out of State
J	2/11/2024	Out of State	skylar mccollough	2/18/2024	Out of State
Jim Steitz	2/11/2024	Out of State	Stephanie L	2/18/2024	Out of State
Lenore Sivulich	2/11/2024	Out of State	Steve Gray	2/18/2024	Out of State
Letitia Noel	2/11/2024	Out of State	Tammy Beck	2/18/2024	Out of State

Name	Date	Area of Residence	Name	Date	Area of Residence
Veronica Bourassa	2/11/2024	Out of State	Terry Rice	2/18/2024	Out of State
Donna Buscemi	2/12/2024	Out of State	Theresa DeLuca	2/18/2024	Out of State
Janet Delaney	2/12/2024	Out of State	Till Meier	2/18/2024	Out of State
Katherine Hinson	2/12/2024	Out of State	Todd Monson	2/18/2024	Out of State
Jennifer Scott	2/13/2024	Out of State	Tonya Sexton	2/18/2024	Out of State
Julia Thollog	2/13/2024	Out of State	Veronique Jarrell-King	2/18/2024	Out of State
Juliana Yang	2/13/2024	Out of State	Virginia Watson	2/18/2024	Out of State
Terri Raimondo	2/15/2024	Out of State	William Merry	2/18/2024	Out of State
mychel Flack	2/16/2024	Out of State	Carol Joan Patterson	2/19/2024	Out of State
Aarati Joly	2/17/2024	Out of State	Chey Richmond	2/19/2024	Out of State
Adelheid Koepfer	2/17/2024	Out of State	Dan Morgan	2/19/2024	Out of State
Alena Jorgensen	2/17/2024	Out of State	David Katz	2/19/2024	Out of State
Alexandra Sweitzer	2/17/2024	Out of State	Dawid Henning	2/19/2024	Out of State
Alexandra Tumarkin	2/17/2024	Out of State	Donna Jones	2/19/2024	Out of State
Alexis LaMere	2/17/2024	Out of State	Frank Pilholski	2/19/2024	Out of State
Alice West	2/17/2024	Out of State	Glenn Outon	2/19/2024	Out of State
Allison Fradkin	2/17/2024	Out of State	Holly Hall	2/19/2024	Out of State
Amy Mower	2/17/2024	Out of State	Jasha Stanberry	2/19/2024	Out of State
Ann Connor	2/17/2024	Out of State	JOHN Lamb	2/19/2024	Out of State
Ann Unertl	2/17/2024	Out of State	katarina spelter	2/19/2024	Out of State
Ann Wasgatt	2/17/2024	Out of State	Kathleen Smaluk-Nix	2/19/2024	Out of State
Arlene Aughey	2/17/2024	Out of State	lin farley	2/19/2024	Out of State
B	2/17/2024	Out of State	Lorraine Moore	2/19/2024	Out of State
Babara Franck	2/17/2024	Out of State	Merrie Thornburg	2/19/2024	Out of State
Barbara Abraham	2/17/2024	Out of State	Michael Rynes	2/19/2024	Out of State
Barbara Benzwi	2/17/2024	Out of State	Paula Shafransky	2/19/2024	Out of State
Barbara Blackwood	2/17/2024	Out of State	Robert Wolf	2/19/2024	Out of State
Beverly Stowe	2/17/2024	Out of State	Scott Gray	2/19/2024	Out of State