

September 15, 2023

Board of Directors  
Chugach Electric Association  
5601 Electron Way  
Anchorage, Alaska 99518

RE: Eklutna Hydro Mitigation

Dear Ladies and Gentlemen of the Board,

We are writing to encourage you to increase your engagement with the Eklutna hydroproject mitigation process. We are grateful for your interest in the topic to date and we request your direct involvement in the process at this critical juncture.

Here are the reasons we feel strongly that the Board's action is needed:

- The Eklutna Hydroelectric Project Owners (CEA, MEA, and MOA) are set to release a Draft Fish and Wildlife Program in October 2023.
- This Draft represents a position statement of CEA and, hence, the CEA Board.
- The Draft will identify the AWWU Portal Option as the Eklutna Owners' Preferred Alternative.
- The AWWU Portal option would leave ~1 mile of dry riverbed, fail to reconnect Eklutna River to Eklutna Lake, and will not mitigate the principal harms identified in the 1991 Agreement ("loss of a Sockeye salmon run.")
- The two federal signatories (FWS and NOAA Fisheries), the Native Village of Eklutna, Eklutna Inc., Trout Unlimited, the Alaska Center, and The Conservation Fund agree that Eklutna River must be connected to Eklutna Lake for fish passage and continuous water flow.
- The Eklutna Owners and their consultants (McMillen) have not attempted to reconcile the differences between the parties as is required by the 1991 Agreement. We think this should be done prior to the release of the Draft Fish and Wildlife Program.
- Cost estimates prepared by McMillen are unreliable. For instance, Eklutna Inc. estimates the Replacement Dam construction costs, providing fish passage and river connectivity to Eklutna Lake, to be tens of millions of dollars less than the figure asserted by McMillen. We believe an independent financial analysis should be conducted of the leading alternatives.
- Significant concerns have been raised about whether and how an AWWU Portal would affect safety, stability, and operations for Anchorage's drinking water system. Periodic maintenance of the AWWU system requires regular shutdowns that would result in fish strandings. We believe that the AWWU Portal option should be reviewed by an independent engineer for issues of safety, integrity, and feasibility.
- It is our collective opinion that the analysis by McMillen significantly understates the potential spawning and rearing habitat for sockeye salmon and other species in Eklutna Lake and its tributaries, dramatically skewing the cost/benefit analysis.

- Approximately 2/3rds of the Eklutna system would benefit from restored fish passage and require no further restoration. This includes the entirety of Eklutna Lake and its tributaries, which would be the most productive habitats in the system.
- McMillen asserts that the existing landlocked salmon in Eklutna Lake are malnourished because of inherent low primary productivity. It is likely that the lack of marine nutrients that would be imported by returning salmon is depressing this productivity and holding these fish back.
- The fundamental issue of environmental justice to the Eklutna Dena'ina has been substantially devalued in the 1991 Agreement process.

Many of these deficiencies in the 1991 Agreement process to date can and should be addressed before the release of the Draft Fish and Wildlife Program. Our request has been echoed by the federal resource agencies. Please see the letter, attached here, from NOAA Fisheries for an in-depth analysis of the 1991 Agreement process.

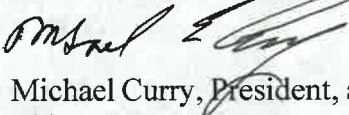
This is the only opportunity in our lifetimes to demonstrate that Eklutna hydro power can co-exist with salmon and make amends for nearly a century of cultural and environmental neglect.

We encourage the Board of Directors to get more directly involved now rather than waiting until April 2024. With your input we recommend that the Draft Fish and Wildlife Program include fish passage and continuous flow of water between Eklutna River and Eklutna Lake.

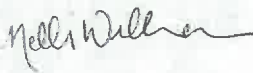
Sincerely,



Aaron Leggett, President  
The Native Village of Eklutna



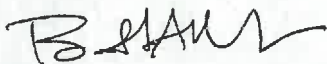
Michael Curry, President, and Chair  
Eklutna Inc.



Nelli Williams, Alaska State Director  
Trout Unlimited



Chantal de Alcuaz, Co-Executive Director  
The Alaska Center



Brad Meiklejohn, Senior Alaska Representative  
The Conservation Fund