MEMORANDUM

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FILE NO:

SUBJECT:

Alaska Dept. of Fish & Game Susitna Hydro Aquatic Studies ELEPHONE NO:

465-4100

FROM: Don W. Collinsworth Commissioner

Department of Fish and Game

Reorganization of the Susitna Aquatic Studies

The enclosed administrative reorganization plan for the Susitna Aquatic Studies Program takes effect July 1, 1985. This reorganization is necessary at this time to ensure continuity in the administration of the Susitna Aquatic Studies Program for this coming open water field season.

Effective July 1, 1985, the Susitna Aquatic Studies Program will be administered by Region II of the Division of Commercial Fisheries, with the Susitna Aquatic Studies coordinator position being directly supervised by the regional supervisor of that region. The coordinator will responsible, under the direction of the regional supervisor, for planning and coordinating all departmental salmon escapement activities on the Susitna River, in addition to administrating the RSA between the Alaska Power Authority (APA) and the Division of Commercial Fisheries for FY 86. The coordinator will also summarize all of the salmon escapement data collected to date in the Susitna River by the combined efforts of the Divisions of Sport Fish and Commercial Fisheries into one departmental technical data report. In addition, the coordinator will chair a committee of regional Sport Fish and Commercial Fisheries staff to ensure proper planning of future Susitna River escapement studies.

To accomplish these tasks, the coordinator FB IV position will be transferred to Region II of the Division of Commercial Fisheries.

All of the remaining Susitna Aquatic Studies Program permanent PCNs, with the exception of one Biometrician I/II position, will remain in the division they are currently assigned to through the duration of FY 86. Any lay-offs that may occur during FY 86 in the Susitna Aquatic Studies Program will follow DOA guidelines with the PCNs remaining within their currently assigned division. As such, the reorganization effects only the general administration of the Susitna Aquatic Studies Program, not the divisional status of PCNs. Any loaned PCNs will be returned to their respective source when they are vacated. PCNs that were

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created with the provision that they were solely for the Susitna Aquatic Studies Program will not be transferred from the program. All vacated positions will be either returned, if borrowed, or remain vacant, unless the position is required to be filled to meet specific contractual obligations under the FY 86 agreement with the APA.

The Susitna Aquatic Studies biometrics staff will remain under the supervision of the Division of Sport Fish State-wide Biometrician III, with the exception of the one Biometrician I/II position, which will be transferred to Region II of the Division of Commercial Fisheries.

All Susitna regulatory activities proposed for FY 86 will be implemented under separate contractual agreements between the APA and the Division of Sport Fish, for funding a regulatory support team, and the Habitat Division, for funding that division's permitting and project review staff. The Division of Sport Fish will make its technical expertise in instream flow analysis available to the Habitat Division for the review of the various regulatory aspects of the Susitna project. The Habitat Division will use this information for coordinating the development of departmental policy positions and in representing the department's position on the Susitna project. The four individuals within the Sport Fish Division who are covered by that division's RSA with the APA will be required to work out of the Anchorage Raspberry Road office in order to ensure physical separation between that division's participation in the regulatory activities of the department and the other contractual requirements of the Susitna Aquatic Studies program.

The enclosed reorganization plan and supporting documents detail the rationale and organizational structure I am implementing by copy of this memorandum.

Enclosures

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cc: Denny Kelso Steven Pennoyer

REORGANIZATION PLAN FOR SU HYDRO AQUATIC STUDIES PROGRAM ALASKA DEPARTMENT OF FISH AND GAME

l. Introduction

Historical Organization and Objectives

The Alaska Department of Fish and Game (ADF&G) Su Hydro Aquatic Studies Team was organized in 1980. The team was established to ensure that the ADF&G would have an adequate and legitimate data base from which it could fulfill its statutory responsibilities to provide a timely evaluation of the potential impacts of the development of the hydro-electric facilities at Watana and Devil Canyon.

The ADF&G Susitna Hydro Aquatic Studies program was initiated with a five year study plan developed in October, 1979. The general goal of the program under this five year plan has been to collect and analyze baseline fishery and aquatic habitat information on the pre-project fishery resources of the Susitna River basin with the intent of continuing the study program in the event of project construction. Six objectives were initially outlined in the 1979 five year plan. These were to:

- Determine the relative abundance and distribution of adult anadromous fish populations within the drainage.
- 2. Determine the distribution and abundance of selected resident and juvenile anadromous fish populations.
- 3. Determine the aquatic habitat and instream flow seasonal requirements of anadromous and resident fish species during each stage of their life histories.
- 4. Determine the economic, recreational, social, and aesthetic values of the existing resident and anadromous fish stocks and habitat.
- 5. Determine the impact the Devil Canyon project will have on the aquatic ecosystems and any required mitigation prior to a construction approval decision.
- 6. Determine a long-term plan of study, if the project is authorized, to monitor the impacts during and after project completion.

Information pertaining to the first three objectives has been supplied to the Alaska Power Authority (APA) at the end of each fiscal year in the form of basic data reports summarizing the pre-project conditions of fishery resources and their response to flow variations in the Susitna River basin.

The data and conclusions in these ADF&G reports are being used by the APA and its sub-contractors to assess potential post-project impacts on the fish resources of the Susitna River and their aquatic habitats.

To meet the first three objectives, the ADF&G/Susitna Hydro Aquatic Studies Program was initially divided into three principal study units, each assessing what was viewed as essentially unique aspects of the fisheries and associated habitat resources of the Susitna River basin. These three study units were the Adult Anadromous Fish Studies (AA) program, the Resident and Juvenile Anadromous Studies (RJ) program, and the Aquatic Habitat and Instream Flow Studies (AH) program. Two additional support units were also created, the Data Processing (DP) Unit and the Administrative Support Unit. Another study unit, the Secondary Task Coordination Support Unit, was later added to the overall study program to meet increased data interpretation demands of the APA and to review and edit other draft reports prepared by the various APA Su Hydro private contractors.

Future Needs and New Objectives

The 1980-84 studies primarily addressed the data collection and pre-project condition analyses which will be required by the department to provide a basis for assessing impacts of the proposed hydroelectric development on fisheries and habitat resources. With the completion of the upcoming year (FY 86), approximately five years of data on the fishery resources and a large number of studies on the habitat requirements of all species and important life phases will have been obtained. This collection effort and subsequent analysis reflects nearly \$15 million dollars in expenditures.

With the completion of objectives 1-3 and 4 above, the remaining two objectives (5 and 6) remain to be implemented by the ADF&G to enable it to meet its statutory requirements and enable the APA to complete the Federal Energy Regulatory Commission (FERC) licensing process. Objectives 5 and 6 include the completion of the quantification of impacts of the proposed hydroelectric project, the development of a departmental mitigation strategy that addresses the impacts, and provide a monitoring program or enforcement structure to all of the ADF&G to ensure the mitigation plan is implemented and effective.

Specifically, the following activities will be required to meet Objectives 5 and 6:

- 1. Completion of ongoing spring 1985 field studies that are of a short-term nature (and associated reports).
- 2. Continue monitoring efforts to provide a long-term reference to assess actual project impacts and mitigation success. Implement any additional monitoring required to address site-specific mitigation efforts.

^{*}Objective 4 is currently being addressed by Harza Ebasco and its subcontractors.

- 3. Provide analytical summaries of the previously established data base that can be used by resource group policy makers in the regulatory process and that can be used by Alaska Power Authority (APA) and its contractors in mitigation planning.
- 4. Provide critical review of documents prepared by the APA, FERC and their consultants through the Habitat Division to ensure departmental policies are being implemented in the proposed development.
- 5. Develop a departmental policy through the Habitat Division concerning the desired type of mitigation activities to be recommended for implementation to the APA.

Problems with Current Organization in Meeting Future Needs

The current organizational structure of the Susitna Aquatic Hydro Studies within the ADF&G and the contractual agreement with the APA are primarily designed to provide field data collection and analysis of data only as it pertains to pre-project conditions. Unfortunately, direct transmittal of this information, and its interpretation, to the Habitat Division is not permitted under the existing structure and contractual agreement. Accordingly, the major requirements in the future are insuring that the data collected by the ADF&G and other consultants to the APA, and the existing pre-project analyses of these data, are integrated into the ADF&G project review process and that these data are properly interpreted for use by the ADF&G.

The only source of expertise presently available to the department in the area of instream flow assessment and in understanding of the fishery resources of the Susitna River in the vicinity of the project is within the present ADF&G Susitna Aquatic Studies Team. Yet, there is a ban against the communication and interchange of data and interpretation of these data between the ADF&G Habitat Division and ADF&G Susitna Aquatic Studies Team within the department. It is, therefore, highly probable that the interpretation of data by the ADF&G Susitna Aquatic Studies Team will disagree with the interpretation of information by the Habitat Division of the department.

As the Susitna project becomes more visible during the FERC hearing process, the public could easily be exposed to two departmental positions because of the separation of the ADF&G Susitna Aquatic Studies Team from the remainder of the department. This problem could also occur in other management functions of the department with differences in interpretation of the population data that may affect public understanding of management decisions.

In the development of mitigation plans with the FERC and negotiations of an instream flow, it is essential that interpretation of the fisheries resource data from Susitna Aquatic Studies Team be consistent and completed in a timely manner.

Therefore, the reorganization plan discussed below would integrate the expertise within the ADF&G Susitna Aquatic Studies Team into the department and resolve these deficiencies.

The proposed reorganization also ensures that the analytical capabilities that the APA requires to interpret Susitna Aquatic Studies and related fishery and habitat data, remain available through the settlement process and FERC licensing hearings.

Part of the proposed reorganization duplicates the administrative structure which has been used by the ADF&G, Division of Game, Susitna Aquatic Terrestrial Study Team since 1980.

In summary, a reorganization of the Susitna Aquatic Study Team is necessary to ensure that the investment the State of Alaska has made in an intensive Susitna River data collection effort be fully utilized in the hydroelectric project decision making process. This can only be accomplished by properly incorporating the data base collected by the ADF&G Susitna Aquatic Studies Team into the ADF&G regulatory process. This reorganization is based on the premise that it is desirable to both the ADF&G and the APA that the department have one evaluation of the collected data base.

II. Proposed Reorganization

The following reorganization plan resolves most of the problems discussed above. The current administrative structure of the ADF&G Susitna Aquatic Studies Team is depicted in the flow diagram in Attachment A. The reorganization plan is depicted in Attachment B. Information flow within the department and to and from the APA is illustrated in Attachment C.

The reorganization both redistributes and divides the existing Aquatic Habitat and Instream Flow (AH), Adult Anadromous (AA), and Resident and Juvenile Anadromous (RJ) projects and the administration and data processing into components:

- a field monitoring program, including completion of short term studies. and
- 2) an analytical and technical support program.
- 3) a technical instream flow evaluation program in support of departmental regulatory functions.

The current Susitna Aquatic Studies Program Coordinator position (FB IV) will supervise the first two program components. Sufficient administrative staff will provide personnel and administrative support to these programs. These two programs would be administered under the Division of Commercial Fisheries, Region II Supervisor with indirect supervision by the Division of Sport Fish, Region II Supervisor.

The field monitoring program of component one will complete ongoing field tasks started in FY 85, complete short-term studies and monitoring activities, and initiate a long-term monitoring program. The long-term and short-term monitoring programs of component one will be administered by two Sport Fish FB III level project leaders. Both programs within the first component will be assisted by eight of the FB II's currently within the existing three AH, RJ, and AA projects. General analytical support for these activities will be provided by the second program component.

The second program component is designed to ensure proper interpretation of the existing data base. A group of the FB II level biologists from the three field programs and data processing support staff form this second component. This group will be headed by a Biometrician II and will incorporate three FB II biologists. Assuming there are no layoffs in the Sport Fish Division, this group will represent a portion of the individuals with the most writing and analytical experience necessary for incorporating all facets of the existing ADF&G Susitna Aquatic Studies Team in their work. Also included in this group are various clerical and report preparation support staff positions. Overall instream flow technical oversight and support of this program component will be provided by the Division of Sport Fish Biometrician III and supporting staff.

This second program component will provide data summaries of fish population data and reports and instream flow data that will be usable by regional policy makers and APA consultants. Finally, they will assist in providing the general analytical assistance and data base management to the first program component.

A third program component will be developed completely separate from the first two, under direct supervision of the Statewide Biometrician III, Sport Fish. This component will consist of a Sport Fish FB III coordinator and two Sport Fish FB II's. The third program component provides detailed review and analysis of APA documents pertaining to instream flow and aquatic habitat studies.

To ensure a common departmental policy position, all documents developed by the third program component and comments from other fisheries reviewers will be assembled by the FB III coordinator of this third program component group and be circulated for review to the Region II Fisheries Division designees. After input from the other divisions, the Habitat Division will be responsible for formulating a coordinated department policy position to be transmitted to the APA. In summary, this proposed reorganization of the existing ADF&G Susitna Aquatic Studies Team program will provide a consistency between the fisheries program and the current relationship of the Division of Game, Susitna River program with the Region II Division of Game and Habitat; thus, allowing the department to meet its statutory mandates.

Description of Change in Administrative Structure

The following is a summary of permanent personnel distribution in the proposed restructuring. The specific assignments of FB II's may change when a final program is developed. No layoff situation for FB II's is anticipated

until the spring of 1986. Sport Fish and Commercial Fish pcn's are designated as such, but may be reclassified or reassigned in the final plan. Although personnel availability, future plans, and individual skills are considered in this reorganization, individuals are not specifically assigned to any of the positions outlined.

PERSONNEL

(Permanent Staff Only)

Administration--(Program Coordination)

SF FB IV * - Program Coordinator

Support Services

SF Administrative Assistant I SF Clerk Typist II (temporary)

SF Accounting Clerk II

SF Clerk Typist III

I. Field Monitoring and Studies Group (Component One)

Short Term Studies (No Further Studies Planned Beyond FY 86)

Coordination and subproject supervision

1 SF FB III (temporary) Group Leader and Coordinator

2 SF FB II

1 CF FB II

^{*}This position will be transferred to the Division of Commercial Fisheries and will be directed by the Division of Commercial Fisheries Region II Regional Supervisor.

Long Term Studies .

Coordination and subproject supervision

- 1 SF FB III Group Leader and Coordination
- 2 CF FB II's
- 3 SF FB II's

Support Services for Long and Short Term Studies

- 1 SF Maintenance Mechanic (WG II)
- 1 SF Maintenance Mechanic (NPP)

II. Analytical Study Group (Component Two)

- 1 SF Biometrician II Group Leader*
- 3 SF FB II's

Data Processing Support Staff**

- 1 SF Biometrician II (part time)
- 2 SF Analyst/Programmer III
- 1 SF Data Processing Clerk II

III. Susitna River Instream Flow Evaluation Regulatory Support Team (Component Three)**

- 1 SF FB III Group Leader and Coordinator
- 2 SF FB II's
- 1 SF Clerk/Typist II

^{*} To be transferred to the Division of Commercial Fisheries

^{**} Technical administration to be provided by the Sport Fish Division Biometrician III.

III. Time Schedule for Reorganization

Components One and Two are scheduled for implementation on July 1, 1985 and Component Three by July 1, 1985. Deliverables for each group and a due date will be established in the RSA with the Alaska Power Authority. This will also include a distribution of seasonal personnel. It is anticipated that the analytical and evaluation group be funded from APA RSA funds during FY 86 and will continue past that time if required by the ongoing regulatory process. The short term monitoring studies and continuation studies will not be extended beyond FY 86 unless mutually agreed upon by APA and ADF&G. The long term monitoring studies will be continued throughout the development of the project.

ATTACHMENT A
EXISTING ADF&G SU HYDRO TABLES OF ORGANIZATION

--- INDIRECT SUPERVISION

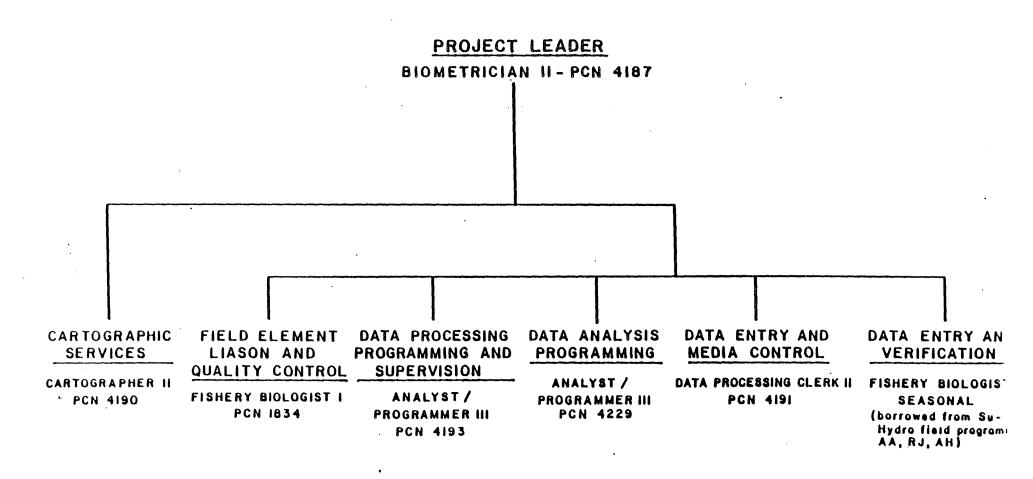
[.] SEE RJ TABLE OF ORGANIZATION

^{**} SEE AH TABLE OF ORGANIZATION

^{***} SEE AA TABLE OF ORGANIZATION

DATA PROCESSING SUPPORT UNIT AND CARTOGRAPHIC SERVICES

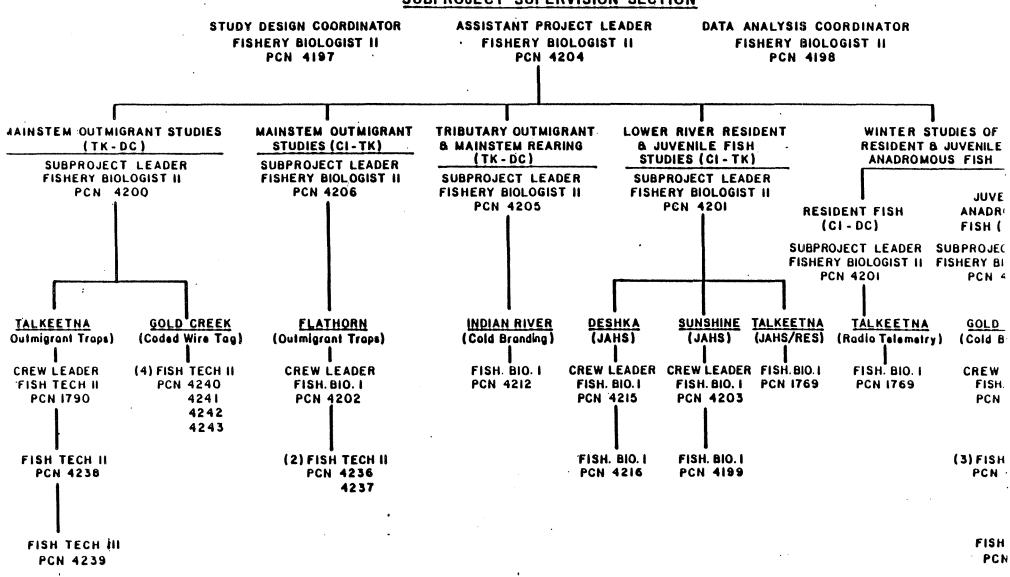
TABLE OF ORGANIZATION FY 85



RESIDENT & JUVENILE ANADROMOUS TABLE ORGANIZATION FY 85

PROJECT LEADER
FISHERY BIOLOGIST III - PCN 4194

SUBPROJECT SUPERVISION SECTION

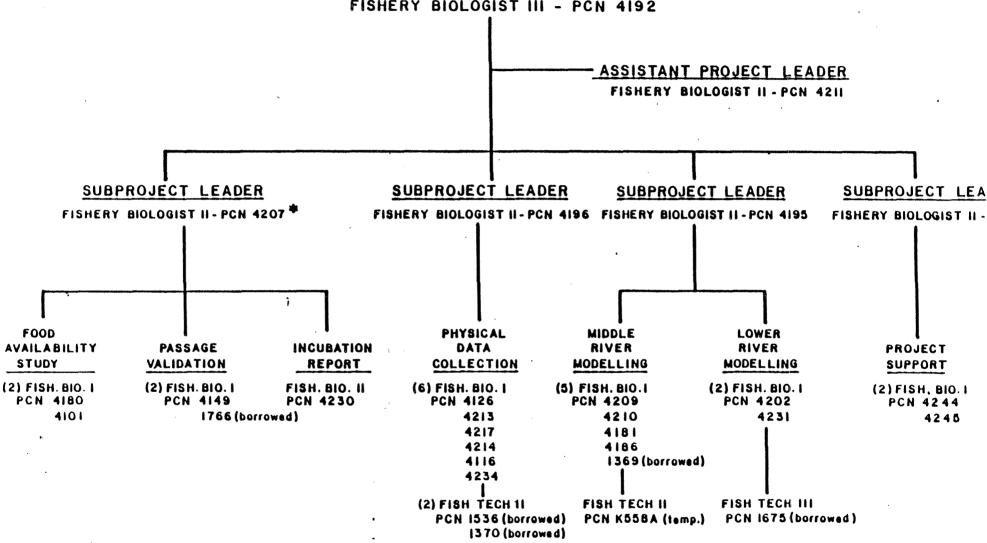


DC = DEVIL CANYON
TK = TALKEETNA

AQUATIC HABITAT AND INSTREAM FLOW STUDIES

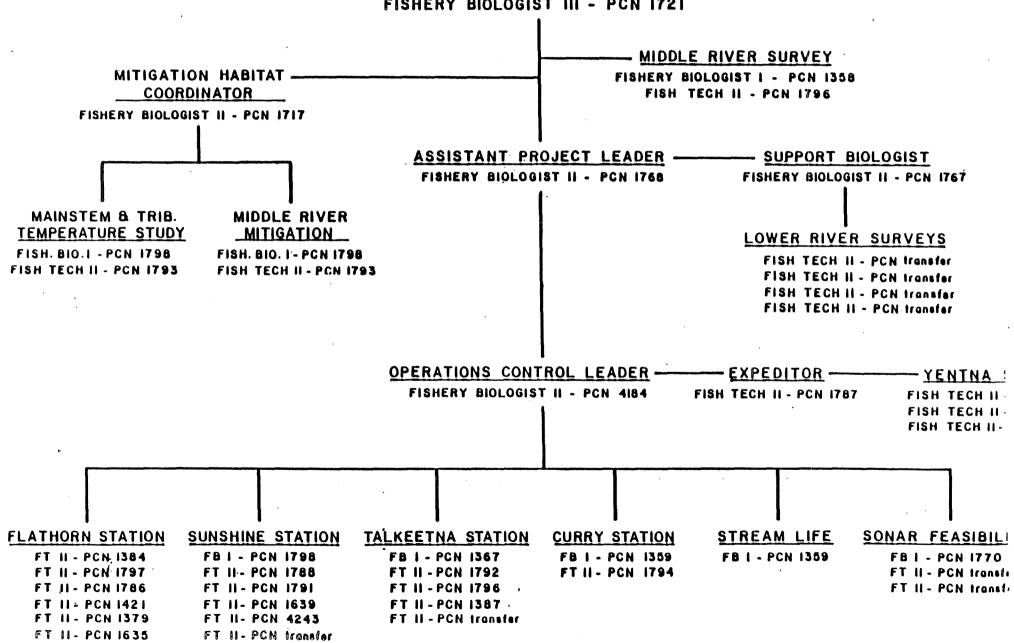
TABLE OF ORGANIZATION FY 85







PROJECT LEADER FISHERY BIOLOGIST III - PCN 1721



FT II - PCN transfer

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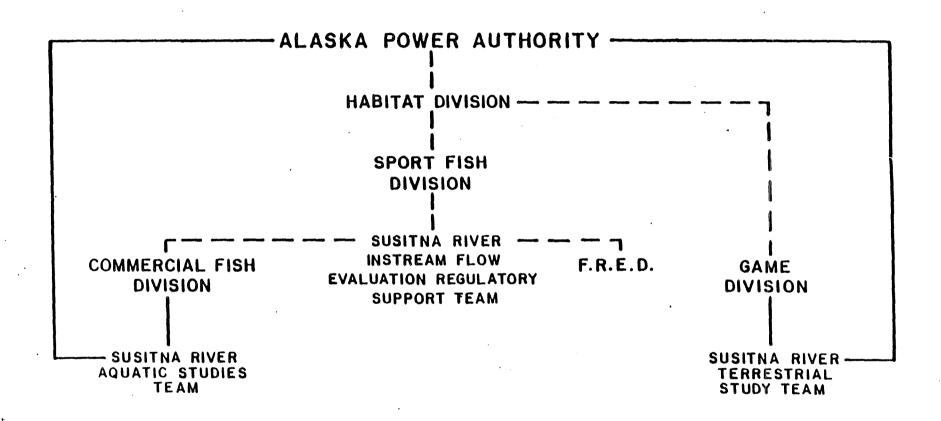
ATTACHMENT B
PROPOSED TABLES OF ORGANIZATION FOR REORGANIZING
THE ADF&G SU HYDRO TEAM

services for the Commercial fish Susitna River Studies

Program.

ATTACHMENT C
ADF&G DIVISIONAL INFORMATION FLOW

SUSITNA RIVER STUDIES REGULATORY & TECHNICAL DATA INFORMATION FLOW FY 86



3/19/8.5 11:00 a.m.

— DATA COLLECTION OR SUMMARIZATIC

REGULATORY RESPONSE