

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

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Statement of Commissioner Ronald O. Skoog to  
Alaska Power Authority Board of Directors regarding  
Susitna Hydroelectric Project Feasibility Report

FR 16 APR 82

The Alaska Department of Fish and Game appreciates the invitation extended by Mr. Conway to provide the Alaska Power Authority (APA) Board of Directors with this Department's views concerning the "feasibility report" on the proposed Susitna Hydroelectric Project. We have not had sufficient time to review the report in detail, but nevertheless do have some comments to make.

In his January 26 letter to the Department, Mr. Conway stated, "Specifically, we wish to know if, in the area of your agency purview and based on information available to date, you judge the proposed project to be cost effective, environmentally acceptable, technically sound, and in general in the best interests of the people of Alaska." My Department's expertise is limited to the second area of concern--"environmentally acceptable"--and therefore my comments will be confined to that. Higher authority than

mine will judge whether or not the project is "cost effective", "technically sound", and "in the best interests of the people of Alaska."

In support of my response to Mr. Conway's request, I am providing the Board a copy of a March 12, 1982, letter and enclosures from my office to the Northern Alaska Environmental Center. This correspondence will provide additional background information outlining this Department's views. My comments today restate many of our prior positions, comments, or advices pertaining to the proposed Su Hydro project.

At the present time, this Department does not believe that the potential environmental impacts of the proposed Susitna Hydro Project from the fish and wildlife perspective can be evaluated adequately, because

- 1) The information and analysis to date are not sufficient to identify the full range and magnitude of potential impacts the project will have on fish and wildlife; and, therefore
- 2) It is unknown as to which mitigation alternatives can or should be applied to offset these impacts.

Absent an adequate evaluation of impacts and applicable mitigation alternatives, we cannot hope to evaluate the environmental costs, the feasibility of mitigation, or the

tradeoffs of fish and wildlife resources and habitat that may be involved. The costs of mitigation should be included as an integral part of the appraisal of the overall costs of the proposed project.

This Department also is unable to conclude at this time whether this proposed hydro project is environmentally sound. It has been this Department's general advice that a minimum of five years would be required to assess and understand project impacts to provide the basis for developing mitigation alternatives. To date, the limited data and impact analysis by the APA's contractor, Acres American (Acres), and the incomplete analysis of mitigation measures do not reflect accurately the actual level of knowledge available thusfar from data collected by the Department this past year. Another constraint upon an acceptable environmental evaluation has been the inadequate time scheduled for impact evaluation and mitigation planning to meet the requirements of State and Federal laws, regulation, and policy regarding fish and wildlife resources.

It has been our general perception that in order to meet predetermined project construction deadlines, the Alaska Power Authority has tended to diminish the views expressed by our agency and others concerning important resource issues, including the level of information that agencies

consider essential to minimize or avoid conflicts on unresolved issues or informational deficiencies which can arise during the review process of the Federal Energy Regulatory Commission (FERC) license application. The APA has had an opportunity to address agency concerns on project issues for over two years, yet generally has remained unresponsive to suggestions to develop a process for formal substantive interagency coordination. Instead resource agencies have had to work on an informal basis through the Susitna Hydro Steering Committee (SHSC). ADF&G recommended in 1979 that this committee, which includes members of my staff, be established with a more formal role than it has now.

I would like to reaffirm that I fully support this committee and the advisory role to the APA they have attempted to fulfill. The SHSC has made a serious attempt to provide advices on project deficiencies and on interagency and interdisciplinary study coordination needs to the APA. (See enclosed copy of letter to Eric Yould from Alan Carson.) APA should recognize and give attention to the concerns the SHSC has advanced even though it has operated only on an informal, advisory basis.

I suggest that the resolution of these concerns about the project prior to initiating the FERC license process application might well be a more prudent course to follow

and might well result in a shorter time-frame for license approval than what might occur should the license application later prove deficient. Additionally, to initiate the application process prematurely with insufficient data probably will result in an undesirable polarization between the APA and the State/ Federal agencies on unresolved resource issues. There are two fundamental elements of resolution that we believe would be desirable before the application for a FERC license is made:

- 1) Completion of one additional year of fish and wildlife baseline data collection, including commitment of budgetary and manpower resources, before attempting an evaluation of habitat-wildlife relationships.

Particular emphasis needs to be given to the aquatic habitat and instream-flow program of the Alaska Department of Fish and Game. The methodologies involved and data collected are essential to quantifying project impacts on Susitna River fishery resources and to some extent can be applied to impacts on terrestrial wildlife resources. This past year, the ADF&G aquatic studies were limited to collection of baseline information.

The impact analysis and mitigation alternative planning role was delegated solely to Acres-American and Terrestrial Environmental Specialists (TES). In our opinion, Acres and TES underestimated the time and manpower resources required to analyze and prepare an impact evaluation from the large amount of information collected by this Department and other project participants. In recent discussions with APA staff, it has been suggested that ADF&G perform the technical analysis of data we collect in FY 83 to assess project effects on habitats. We would accept this role and function provided that a comprehensive interdisciplinary instream flow study program is implemented.

The FY 83 program that ADF&G proposes should be supportive to and supported by field data collection and efforts of other study contractors. There should be some assurance that other important study elements in water quality and hydrology, for example, will be collected and, when applicable, analyzed and made available so the ADF&G can make an objective assessment of project effects on aquatic habitats.

- 2) It is of primary importance that APA initiate a formal program of coordination with State and Federal Agencies to review and identify unresolved project issues, scope of studies, and agency expectations with regard to mitigation planning. APA needs to respond to agency recommendations and to develop an organization, process, and strategy to deal with unresolved project issues prior to submitting the FERC license application as well as with any issues identified after submission during the application review process.

Thank you for the opportunity the APA Board of Directors has afforded the Department of Fish and Game to express our views.

  
Ronald O. Skoog

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