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JAY S. HAMMOND, GOVERNOR

DEPARTMENT OF FISH AND GAME

OFFICE OF THE COMMISSIONER

P.O. BOX 3-2000
JUNEAU, ALASKA 99802
PHONE: 465-4100

October 20, 1982

Mr. Jeff Weltzin
Energy Volunteer
Northern Alaska Environmental Center
218 Driveway
Fairbanks, Alaska 99701

Dear Mr. Weltzin:

Your letter dated August 27, 1982, concerning several questions of the adequacy and completeness of the Federal Energy Regulatory Commission license application which the Alaska Power Authority will submit in February 1983 did not arrive in my office until September 21. Your letter was postmarked September 17. In any case, I regret the delayed response.

Our comments to the questions outlined in your letter are as follows:

1. Is the Department's five-year study requirement still necessary in light of the APA's FERC license application time frame?

Yes, in this Department's opinion the minimum five year time frame for the Su-Hydro fisheries study continues to be necessary for reasonably defining potential fisheries impacts and approaches toward mitigation. We must emphasize, however, that the actual time-frame requirements may be modified in succeeding years for certain study segments. For example, some fisheries-impact-related issues may be adequately covered in less than five years, while others may extend beyond that period. It is also likely that studies evaluating proposed mitigation alternatives and testing of their feasibility will be initiated in the next year or two. Among them will be those ADF&G baseline fisheries studies which have evolved into mitigation studies once a better understanding of potential project impacts is attained.

This year the Department will initiate an analysis of pre-project conditions while the Arctic Environmental Information and Data Center (AEIDC) will address post-project aquatic habitat conditions. These studies also will provide a basis for reevaluating the scope of work and time required to complete the various field data collection

components, which will be necessary to describe project impacts. This information will be presented in the spring of 1983.

2. Similarly, how many more years of study does ADF&G need to fulfill your statutory mandates?

We do not believe your question can be answered in terms of the quantity of data collected through time. Instead it must be viewed on the basis of its quality and ability to provide a factual basis for assessing project impacts on fisheries and aquatic habitats. Again, we expect this to be a pivotal year which we hope to have the data to suggest where, when, and how factual impact conclusions can be made. This Department does not intend that fisheries studies be an interminable process. At the same time it would be inappropriate to second guess the full time frame required by presently identified studies. Following APA's license application to FERC, the additional input of the natural resource agencies to the FERC review process may give considerable guidance to the assessment of impacts on fisheries and aquatic habitats and the adequacy of the submitted mitigation planning and data base. I also refer you to correspondence from my office to you of March 12, 1982.

3. Do the APA's plans of FERC license application submittal in early 1983 allow adequate time for fishery information collected during FY 83 to be included in the proposed application?

No. Analysis and interpretation of information collected by the ADF&G during 1982 will not be finalized until June 30, 1983, in accordance with the report schedule agreed upon between ADF&G and APA (enclosed). Both APA and Acres American (Acres), the APA's prime feasibility study contractor, have noted that the analyses of pre- and post-project conditions which will be performed by the ADF&G and AEIDC in the spring 1983 will be a time consuming and complex process. Furthermore, it has been expressly recognized by APA and Acres that these analyses would not be driven by the February 1983 FERC application deadline. Some provisional data reduction of the 1982 ADF&G fisheries data, however, will be made available to Woodward-Clyde Consultants who are drafting the Exhibit E fisheries portion of the license application and the fisheries mitigation plan. These will be limited to provisional escapement and thermograph data.

It is our understanding that FERC has the option of accepting the license application upon demonstration by APA that

Mr. Jeff Weltzin

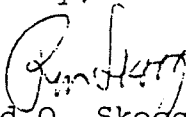
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October 20, 1982

amendment or supplementary data and their analyses are clearly in the process of collection or completion for submittal at a later date. Use of this option by FERC might be based upon formal resource agency recommendations and comments during the FERC license application review process. I also refer you to my comments of April 16, 1982, to the APA on the feasibility of this project.

Thank you again for your continued interest in these questions. Please do not hesitate to contact us again if you have further concerns.

Sincerely,



Ronald O. Skoog
Commissioner

cc: Richard Logan
Steve Pennoyer
Stan Moberly

Enclosure

The following discussion outlines the reporting and planning reports and events the ADF&G intend to follow during FY83. Also included are reports based on the proposed reporting schedule of Woodward-Clyde and the Arctic Environmental Information and Data Center (AEIDC). The information presented is to give a perspective of planning and reporting events related to the ADF&G Su Hydro Aquatic Studies. Some preliminary conceptual detail of our reports is also presented based on preliminary discussions with AEIDC regarding our interfacing role in the analysis and interpretation of pre and post project conditions.

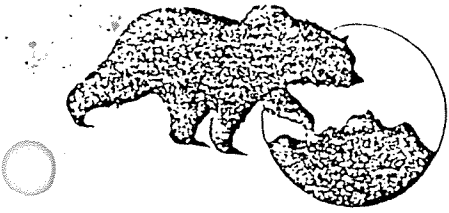
The schedule of planning and reporting events is as follows:

July 15, 1982	<u>ADF&G</u> Draft Procedures Manual FY 83 Field Programs. This is a basic internal ADF&G planning and field guidance document.
July 31, 1982	<u>Woodward-Clyde (Proposed)</u> Draft Mitigation Outline
November 30, 1982	<u>AEIDC (Proposed)</u> , Internal Working Document, conceptualizing and visualizing project impacts on a non-quantitative basis.
January 31, 1983	<u>ADF&G</u> , Draft Basic Data Report. This is an internal working document and also provides for data transmittal to AEIDC and Woodward-Clyde and others as appropriate. It basically presents what the data is, how and where it was collected. The report would include winter 81/82 data and data for the ice free season from May thru October 1982. This report does not include habitat versus fisheries relationship information.
January 31, 1983	<u>Woodward-Clyde (Proposed)</u> , Draft Exhibit E.

March 1, 1983	<u>ADF&G</u> , FY 84 Draft Plan of Study (POS)
April 1, 1983	<u>APA-ADF&G</u> , FY 84 RSA and POS Agreement. Contingent on approval of funding by the Legislature..
April 15, 1983	<u>ADF&G</u> , Revised Draft Basic Data Report
May 1, 1983	<u>ADF&G</u> , Draft Fisheries and Habitat Relationships Report. An internal working document which functions as a data/information transmittal to AEIDC and other study participants.
June 1, 1983	<u>ADF&G</u> , FY 84 Procedures Manual.
June 30, 1983	<u>ADF&G</u> , Final Draft Fisheries and Habitat Relationship Report. This is a formal document available for broad distribution by the APA to study participants, agencies and the public.
June 30, 1983	<u>ADF&G</u> , Draft Basic Data Report. This would cover winter 82/83 work and include incubation study data. This is an internal working document and data transmittal to study participants.
October 30, 1983	<u>AEIDC Proposed</u> , Draft Impact Assessment Report

F. Procedures Manual

(The Alaska Department of Fish and Game will provide an annual
update of the aquatic studies procedure manual by June 1 of each
project year.)



Northern Alaska Environmental Center

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August 27, 1982

COMMISSIONER'S OFFICE

RECEIVED
SEP 21 1982

Commissioner Skoog
P.O. Box 3-2000
Juneau, AK 99802

DEPARTMENT OF FISH AND GAME

Dear Commissioner Skoog:

The Alaska Power Authority Board of Directors has decided to submit an application license to construct the proposed hydroelectric dams on the Susitna River to the Federal Energy and Regulatory Commission (FERC) sometime during the first quarter of 1983. As you know, the adequacy and completeness of a FERC license application are critical variables in any forthcoming FERC deliberations and also serve an important role in the decision as to whether the proposed dams are the best use of the Susitna.

With the APA's current plans of an early 1983 FERC license application submittal, important issues are raised concerning the effect of their actions on ADF&G's stated five year study requirement:

1. Is the Department's five year fishery study requirement still necessary in light of the APA's FERC license application timeframe?
2. Similarly, how many more years of study does ADF&G need to fulfill your statutory mandates?
3. Do the APA's plans of FERC license application submittal in early 1983 allow adequate time for fishery information collected during FY 83 to be included in the proposed application?

Your timely responses to these issues will be of great importance in informing the Alaskan public of the complex considerations required to make an informed decision on the proposed Susitna dams. Thank you.

Sincerely,

Jeff Weltzin
Jeff Weltzin
Energy Volunteer

CC: S. Moberly
E. Logan
S. Pennoyer
FERC
Governor Hammond