

# STATE OF ALASKA

JAY S. HAMMOND, Governor

ESTES ✓

## DEPARTMENT OF FISH & GAME

March 19, 1981

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

Dear Mr. Weltzin:

Your letter of February 12 poses several questions regarding the position of the Department of Fish and Game on enhancement of salmon fisheries in the upper Susitna River drainage. This Department is aware of the interest in salmon enhancement connected with this project and our view is presented hereafter in response to your questions.

1. *What is ADF&G's position regarding evaluation of upper Susitna salmon enhancement within the context of the Susitna studies?*

The studies being conducted in Phase I by the Department of Fish and Game on the Susitna River's fishery resources are primarily directed towards evaluating the existing anadromous and resident fish communities and their seasonal habitat requirements. This study is expected to continue until the longer Phase II program begins in July of 1982 under which we will then attempt to identify the potential impacts of the proposed two dam system on the fishery resources and outline mitigative alternatives. The long term goal of this Department with respect to potential impacts of the Susitna Hydro Project on fishery resources is to seek mitigation of these impacts to minimize any losses of the fish and wildlife resources and habitat that sustains them.

It has been the policy of this Department that a firm, individual, or governmental body constructing or developing a project is not required to mitigate impacts to fish and wildlife resources from development project which would achieve an end result that enhances the fish and wildlife resources above the overall pre-project level; rather, the constructing entity is expected to achieve a parity of production with the existing identified pre-project production and value of these resources within the areas of impact. I might note, however, that mitigation to parity by the constructing entity could occur by enhancement of fish and wildlife production and human access to the fish and wildlife resources in another location.

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Our position is, therefore, that the Department would review enhancement as a possible mitigation measure for offsetting a substantial project impact on natural stocks of fish during Phase II of the studies. The Department will not request the Alaska Power Authority to address enhancement based on the conjecture that a viable enhancement project without the hydro project is possible in the upper Susitna Basin. Attempting to establish salmon runs with or without the hydropower project in the upper Susitna basin is a complex issue to evaluate in itself, and may involve possible environmental impacts on naturally occurring resident stocks which may or may not be acceptable. The study of the introductions of salmon for enhancement purposes in the upper drainage is inadvisable at this time, in our opinion, unless the Alaska Power Authority adopts a policy or position by which they commit to enhancement studies, and thereafter, commit to not only mitigation at parity of possible natural fish stock impacts, but also to enhancement of fishery stocks above existing production levels.

2. *How would ADF&G address upper Susitna salmon enhancement?*

The Department would address upper Susitna salmon enhancement based on its potential feasibility and the evaluation of its need and value in relation to proposed enhancement projects throughout the Cook Inlet area. A long term planning process for the identification of potential enhancement projects is ongoing at present by the Cook Inlet Regional Planning Team (CIRPT) composed of the Cook Inlet Aquaculture Association (CIAA), and ADF&G's Sport Fish Division, Commercial Fish Division, and Fisheries Rehabilitation and Enhancement Division (FRED). The attached memo by Ken Tarbox of the Soldotna Office of ADF&G Commercial Fish Division to Tom Walker of CIAA includes a list of known, developing, and suspected rehabilitation and enhancement projects they are reviewing presently.

Also attached for your information are two 1977 memoranda between Jim Riis, Sport Fish Division and Paul Janke of FRED, regarding the barrier to salmon mitigation in the Devil's Canyon reach of the Susitna River, and possible methods of passing fish around that barrier.

3. *Is there adequate funding in the Fish Ecology studies budget to give proper evaluation to potential and feasibility of salmon enhancement within the phase one time frame on the Susitna Studies?*

As stated earlier, the Su Hydro Aquatic Studies are not designed to expressly evaluate any one mitigation alternative, such as the feasibility of salmon enhancement in the upper Susitna Basin (with or without the proposed hydroelectric project). The Department believes the funding (as currently being renegotiated) for those project activities we are directly conducting in FY 81 and FY 82, is sufficient to support the data collection and general objectives of assessment of project impacts as outlined in the June 30, 1980 RSA. The Department has some difference of opinion with the APA regarding total adequacy of the Phase I information which will be submitted to the Federal Energy Regulatory Commission (FERC) to initiate the license application process in 1982 (refer also to the ADF&G October 1980 Plan of Study). However, APA has indicated

their commitment to the continuation of the aquatic studies into Phase II to continue answering these impact issues. In the end, the determination as to the adequacy of the data at the time of the preliminary license submission is essentially the FERC's to make. Our difference with the APA concerns the ability of their consultant group to evaluate the potential project impacts with basically one year's data on fisheries. FERC may, however, find that the data and preliminary evaluations given to that agency are sufficient to begin the licensing and EIS development processes provided that the APA and the Acres American and TES consultant groups provide a strong qualification of unresolved issues, and a plan and budget for continuing aquatic studies to assess the substance of these issues before the final decision to approve or disapprove the project is made.

4. *If adequate funding for study of upper Susitna salmon enhancement is not available in the existing Fish Ecology studies, do you plan to seek the necessary funding this session?*

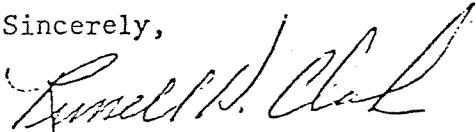
The Department does not plan to seek funding this session to specifically provide for enhancement studies in the upper Susitna basin. Most of the work being conducted under our existing program would be basic to initial studies required for determining enhancement potential of the upper basin, however.

5. *Does ADF&G consider study of upper Susitna salmon enhancement to fall under its legal mandate to manage, protect, maintain, enhance, and extend the fish and game of Alaska?*

Certainly, this is a part of our legal mandate, but functionally the resolution of enhancement potential in the upper Susitna basin is not the APA's responsibility to fund and support. The separate regional planning process in the Cook Inlet on the rehabilitation and enhancement of salmon fisheries, being conducted by CIAA and the management elements of the Department's fisheries divisions, is the mechanism by which consideration of enhancement would be scheduled, prioritized, and evaluated.

If you have further questions regarding the Su Hydro Aquatic Studies related issues from this Department's viewpoint do not hesitate to contact my office again.

Sincerely,



*for* Ronald O. Skoog  
Commissioner  
(907) 465-4100

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cc: D. Wozniak, APA