

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

OFFICE OF THE COMMISSIONER

JAY S. HAMMOND, GOVERNOR

SUPPORT BUILDING
JUNEAU, ALASKA 99801

Susitna Dam

August 14, 1978

Mr. Eric Yould
Executive Director
Alaska Power Authority
333 W. 4th Avenue
Anchorage, Alaska 99510

Dear Mr. Yould:

The Alaska Department of Fish and Game has completed the attached report to fulfill contract obligations to the U.S. Fish and Wildlife Service. This report summarizes data collected for studies relating to the Susitna River Hydroelectric Projects during the contract period of March 1, 1977 to December 31, 1977. In addition to completing the objectives outlined in the contract, ADF&G has devoted considerable time to biological study plans and cost estimates (which are also attached) in response to the Corps of Engineers (COE) Susitna Plan of Study (POS) of October 1977.

The primary objective of the Department of Fish and Game is to protect State fish and wildlife resources which are held in high esteem by the State of Alaska and the nation as a whole. In pursuing this objective, my staff has worked with the Alaska Power Authority (APA) and the COE in a coordinated effort to transform the proposed fish and wildlife studies in the Susitna Hydropower Plan of Study into a workable future program. This Department is determined to insure that essential Phase I biological investigations are conducted, and that funding is adequate to execute them. I will comment hereafter on several issues which appear to jeopardize our ability to meet this objective.

While this Department has been basically satisfied with the development of the biological investigations as shown in the narrative of the draft revised Susitna Hydropower POS, we are still concerned that the time to conduct these studies is critically short and that funding is inadequate. Last December, the Department recommended that five years would be required to adequately carry out study objectives. However, in the Corps of Engineers' draft revised POS for Phase I, the studies are limited to a three-year period. We have emphasized that certain critical Phase I biological studies must be extended beyond the three year Phase I effort. These studies will

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be needed, for example, to complete work on fish species with five year life cycles and to complete the moose, caribou and certain other studies in the Corps POS. This data base is required if we are to address the question of mitigation in a reasonable manner. This Department agreed to consider shortening the time frame of its overall proposed Phase I studies through increased annual effort and funding required to intensify and compress study times, but not curtailing required biological investigations.

I understand the COE will limit studies to a 25 million dollar budget because of the provisions of P.L. 94-587, the Alaska Hydroelectric Power Development Act. They have allotted only 4 million dollars to the proposed biological studies in the revised POS. In April of this year, this Department recommended a minimum budget of about 7.9 million dollars (based on 1978 dollars) to accommodate the required intensity of study during Phase I. I believe it is imperative that the Alaska Power Authority critically examine the constraints of the 25 million dollar price tag for the Phase I studies. This dollar barrier unduly limits our proposed studies and ignores the potential for negative environmental impacts and higher engineering costs due to inadequate planning and study. It would be beneficial for all agencies involved in the Susitna Hydropower Project to project the true cost of needed studies and cooperatively seek funding from appropriate sources. I recommend that the Alaska Power Authority assume the leadership role in working to obtain these funds.

Thank you for your consideration of these matters.

Sincerely,



for Ronald O. Skoog
Commissioner

cc: Colonel George Robertson - COE, Anchorage