



BRISTOL BAY

Regional Seafood Development Association

October 14, 2021

Laura Johnson – McMillen Jacobs Associates
Licensing and Regulatory Consultant
1011 Western Ave, Suite 706
Seattle, WA 98104
Submitted via email to ljohnson@mcmjac.com

Re: Informal comment on the proposed Nuyakuk River Hydroelectric Project

Bristol Bay Regional Seafood Development Association (“BBRSDA”) represents 1,862 salmon driftnet permit holders that harvest roughly 80 percent of the salmon caught in Bristol Bay. Bristol Bay is the most productive and most valuable salmon fishery in the world, typically yielding over \$250 million in ex-vessel value. As you probably know, the commercial salmon industry is by far the largest economic sector in the region. The livelihood of these fishermen, their crew members, and many other local residents depends on abundant and sustainable salmon runs, which in turn depends upon preserving critical salmon habitats.

We have reviewed the proposed Nuyakuk river hydroelectric project and while our fleet certainly appreciates efforts to lower the cost of electrical power in the area, we do have some concerns which are summarized below.

Lack of a Comprehensive, Independent Cost/Benefit Study

The Nushagak Electric & Telephone Cooperative (NETC) and McMillen Jacobs have provided some cursory details of what may be gained by replacing diesel with hydro power, but there needs to be a comprehensive analysis of potential costs and risks. It is also critical that this report be independent or at least peer reviewed to assure the data and assumptions made are accurate and objective.

The Nushagak district, which is comprised of three main river systems (Nushagak, Wood, and Igushik rivers), has been the most productive river in Bristol Bay in recent years. Harvests of sockeye salmon in the Nushagak district averaged 15.5 million fish per year over the past five years, worth an *annual* average of \$23.0 million in ex-vessel value. A brief review of available data provided by Bristol Bay Science and Research Institute (BBSRI) suggests that during the mid-2000s the Nuyakuk river accounted for approximately 24 percent of the Nushagak river’s sockeye salmon run and BBSRI believes that older data may indicate an even higher percentage. It is imperative that stakeholders know how many salmon are migrating through the proposed project area.

This hydro project could also create additional stress on Chinook salmon runs in the Nushagak river. Although relatively few Chinook salmon are caught by commercial fishermen in the Nushagak district, as compared to sockeye, the health of local Chinook stocks has a direct impact on fishing opportunities for (and harvest volume of) sockeye salmon. It has already been a challenge for fishery managers to a) accurately count incoming Nushagak Chinook salmon and b) allow enough Chinook to get up-river without limiting sockeye harvests too much, but the Bristol Bay management plan requires protection for Chinook runs. If the hydro project were to depress already struggling (or inadequately counted) Chinook runs, commercial (and recreational) sockeye fishing opportunities in the *entire* Nushagak district may be significantly restricted. The economic losses from such a scenario would be very large and we believe this worst-case scenario, as well as the potential impact on Nuyakuk river salmon stocks, needs to be thoroughly understood and communicated to stakeholders.

Lack of an Alternative Options Study

Hydro power is just one of several options to replace diesel-generated power in Bristol Bay. Where is the analysis of other alternatives? Wind, tidal, or even solar power may prove to be competitive with a hydro project, if not even more beneficial. Further, these options would likely create less economic risk. Such a study should also include a cost/benefit analysis of what might be gained by *reducing* the need for power generation.

We are aware that previous research has been done on alternative power options; however, it was not clear why this hydro project had been selected as the best alternative. We would recommend that previous studies of alternatives be reviewed and communicated to stakeholders, as well as updated where necessary.

Finally on this point, stakeholders must recognize that we will probably see continued advances in power generation technologies in coming years. A stress-test ought to be performed on this hydro project, in the event that better technologies become available in the next 20 years or beyond. Can the project be profitable within a shorter time horizon?

Concerns about Assumptions and Ability to Meet the “First-First” Resolution

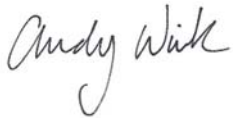
In our discussions with several people who have tracked this proposed project closely, we have heard some concerns about assumptions related to how much water will need to be diverted to achieve the necessary power generation targets. This assumption and others need independent vetting before the project advances too far and consumes any more funding. If more water needs to be diverted to achieve project goals, what impact might that have on assumptions about fish mortality?

Also, while we greatly appreciate NETC’s [“Fish First” resolution \(No. 2017-30\)](#) that prioritizes fish resources, the reality is that it can be very difficult to know if there’s a problem until it is

too late. We would request further research into *how* such a goal will be achieved (as well as funded); and to what extent other projects have been successful in similar efforts. More commonly, it would seem to us that monitoring efforts are not successful in predicting negative impacts until they become apparent, by which time it's often too late to mitigate the damage.

Finally, we would like to recommend that NETC wait to file the proposed study plan with the Federal Energy Regulatory Commission (FERC) until at least March 2022. As we have explained in this letter, many important questions remain unanswered at this time. Despite our concerns at this point, we believe that if prudent steps are taken and stakeholders remain committed to reducing the high cost of power generation in Bristol Bay, such a goal can be achieved without creating negative impacts to the local economy. Please feel free to reach out to BBRSDA if there is a desire to discuss the issues raised in this letter in greater detail.

Sincerely,



Andy Wink
BBRSDA Executive Director
andy@bbrsda.com

CC (via email):

Robert Himschoot, CEO - NETC
Senator Lyman Hoffman
Representative Bryce Edgmon
Alice Ruby, City of Dillingham Mayor
Alannah Hurley, Executive Director – United Tribes of Bristol Bay
Robert Heyano, President - United Tribes of Bristol Bay
Ralph Anderson, President – Bristol Bay Native Association
Norm Van Vactor, President – Bristol Bay Economic Development Corporation
Daniel Cheyette, Vice President of Lands and Resources – Bristol Bay Native Corporation
Tim Sands, Area Management Biologist – Alaska Department of Fish & Game
Christopher Barrows, President – Pacific Seafood Processors Association
Ben Corwin, Superintendent – Alaska DNR, Chugach/Wood-Tikchik Area Office
Michael Link, Executive Director – BBSRI
Bryan Nass, Senior Fisheries Ecologist & President – Salmon Tales LLC