

VIA EMAIL & U.S. MAIL
(mark.myers@alaska.gov)

April 2, 2015

Mark Myers, Commissioner
Alaska Department of Natural Resources
550 West 7th Avenue, Suite 1400
Anchorage, Alaska 99501-3514

RE: SUPPORT FOR RESERVATIONS OF WATER IN THE CHUITNA WATERSHED, COOK INLET

Dear Commissioner Myers:

We the undersigned are retired state and federal biologists and managers with many years of experience working on Alaska's magnificent fish, wildlife and water resources. Please accept these comments in support of the proposed reservation of water in the Chuitna watershed in Upper Cook Inlet.

We are greatly concerned with the growing imbalance between resource development and resource conservation in Alaska regarding reservation decisions. Article 8 of the Alaska Constitution explicitly confirms state policy for balanced resource management, ensuring resources are available for "maximum use" as long as such use is "consistent with the public interest." The demise of the Alaska Coastal Management Program, changes to DNR's mission statement to remove references to "conservation," and attempts to undermine the independence of the ADFG Habitat Division are just a few examples where we've seen management tilt away from conservation in recent years.

Now, we are faced with one of the most important salmon habitat decisions Alaska has ever faced, and the reservation of water in the Chuitna watershed represents a historic precedent for salmon habitat management across the state.

The Chuitna watershed supports all five species of wild Pacific salmon, and the proposed reservation of water will maintain sufficient flows to support wild salmon now and in the future. On the other hand, DNR has received competing claims for the same water, where a company wants to dewater the same stream, strip mine 300' down through salmon habitat, and extract coal for export to Asia.

As a result, we're faced with a vital question: do we reserve water in a stream to protect wild salmon, or give it to a company to dewater the stream and send coal to Asia? We cannot have both. There are no examples – in Alaska or elsewhere - of successful restoration in salmon systems where the underlying hydrology and geology have been removed down to bedrock, and we do not believe the science or technology exist to do it.

Furthermore, while DNR is the lead agency for this proposed reservation of water, we strongly encourage active and informed engagement from the Alaska Department of Fish & Game, the Alaska Department of Environmental Conservation, and federal resources agencies to ensure this issue receives the thorough and balanced consideration it deserves.

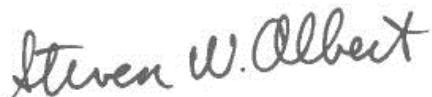
For example, based on the public notice and DNR files, we cannot discern whether ADFG Habitat Division has been actively engaged on this issue, nor can we understand if ADEC has been involved regarding designated uses and other water quality issues. Additionally, there has been no information provided to understand if NMFS has analyzed the implications for Cook Inlet beluga whale prey availability in light of potential impacts to Chuitna watershed salmon populations.

Governor Walker's Fisheries Transition Team made a unanimous recommendation for Alaska to embrace a "fish first" policy toward resource management, and we can think of no better place for that policy to be implemented than in the Chuitna watershed.

We strongly support maintaining water in streams to support salmon. We know all too well how habitat and stream flow mismanagement in the Lower 48 have led to decimated wild salmon runs. Wild salmon define who we are as Alaskans, and if DNR decides to sacrifice a salmon system at Chuitna, the precedent will be set, and fish streams throughout Alaska will be at risk.

Thank you for considering these comments, and please let me know if you have any questions.

Sincerely,



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Signed on behalf of the following state and federal biologists and managers:

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