

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

*Bingham*  
*Estes*  
JAY S. HAMMOND, GOVERNOR

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November 19, 1981

02-81-7.10

Mr. Russell J. Nemechek  
Terrestrial Environmental Specialists  
R.D. 1, Box 388  
Phoenix, New York 13135

Dear Russ:

I am still uncomfortable with the attempt to define specific mitigation options based on the currently available data. This is because currently available data does not sufficiently chart potential impacts, the first step in defining the need for mitigation.

At our last meeting it was suggested that a "laundry" list of mitigation options be prepared for our information. Once we have determined if impacts will occur then we could go through the list of options to discuss those which may be viable.

Also, in my opinion, we still have not written off the feasibility of avoiding or minimizing impacts by providing adequate flows for fish habitats in my opinion. We should not be too hasty to look at out-of-kind engineering solutions which are basically compensatory mitigation for lost habitats. As I have indicated before, the Department's draft mitigation policy and to an extent the USFWS mitigation policy, prioritize implementation of the various mitigation options. Compensation is the last priority option for consideration and I believe the fish and wildlife agencies in reviewing mitigation plans will seek proof that the avoidance, minimization, and other options have been adequately considered in dam design and operation by the Alaska Power Authority and Acres American Inc.

At this time, I prefer to wait for completion of the Su Hydro species/subject reports and a review of the substance of these reports and further information on flows, temperature etc., provided by Acres. Then we will describe what ADF&G-Su Hydro believes the impacts of the project on fish in the Talkeetna to Devil Canyon reach and the impoundment area will be.

I suggest that TES develop the list of mitigation options and alternative and references on their success or failure on other projects. I presently don't have time to review or develop the information on these options and feel my time is best spent in working on the completion of our

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reports which will be most valuable in assessment of project impacts. Until these reports are done, however, I will attend mitigation technical group meetings to keep apprised of the information coming from other sources which is important to the evaluation of impacts.

Sincerely,



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Su Hydro Aquatic Studies  
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cc: M. Bell  
C. Atchinson  
W. Trihey  
R. Williams  
K. Young  
D. Schmidt

*these were  
all consultations at  
that time*

*Dana later came*

*to ADF+G*

*to replace*

*K. Delaney*

*RJ Pay*

*Leader*