



IDAHO DEPARTMENT OF FISH AND GAME
PANHANDLE REGION
2885 West Kathleen Avenue
Coeur d'Alene, Idaho 83815

Brad Little / Governor
Ed Schriever / Director

June 17, 2020

Tammy Alleman
Idaho Department of Water Resources
7600 N Mineral Dr, Ste 100
Coeur d'Alene, ID 83815

RE: Application 98-8018 – Eric Madson

Dear Tammy,

We have reviewed the above named application to appropriate 1.0 cfs from an unnamed tributary to Cow Creek in Boundary County. The purpose of these comments is to assist the decision-making authority by providing technical information addressing potential effects on wildlife and wildlife habitat and how any adverse effects might be mitigated.

The applicant states that they have a diversion structure with gravity flow pipelines to provide irrigation for 76 acres of land from April until November. We recommend that a low maintenance diversion be installed for minimal disturbance in the creek channel. According to Idaho Code 36-906, a diversion must be properly screened in order to prevent fish entrainment. We recommend **less than 0.25" mesh screen and approach velocity of less than 0.5 feet per second** in order to protect juvenile fish from the proposed diversion.

Idaho Code 36-906 also stipulates that no person shall construct a dam which restricts free and uninterrupted passage of fish without an approved fishway. This law includes seasonal fish movements.

Using USGS estimations for streamflow at ungauged sites data, this small tributary to Cow Creek drains 4.41 square miles of land, and has a mean annual flow of approximately 1.78 cfs. The applicant is asking for more than half of the annual mean flow, and runs the risk of totally dewatering a portion of the creek on low water years and during the dry summer months.

In 2018 Idaho Fish and Game fisheries crews surveyed Cow Creek and two of its larger tributaries. The unnamed tributaries for this proposal were not sampled but nearby Brush and Cabin Creeks were both fish bearing streams with brook trout, rainbow trout and cutthroat trout all detected at low densities. The streams were categorized as small streams with limited water during those

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surveys. Small headwaters, fish bearing or not, provide important habitat for macroinvertebrates, amphibians and other native species. They also provide thermoregulation for lower reaches during warmer months.

We are concerned that the cumulative loss of flow from private diversions may negatively impact habitat availability for many native species.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Charles E. Corsi', with a stylized flourish at the end.

Charles E. "Chip" Corsi
Panhandle Regional Supervisor