



IDAHO DEPARTMENT OF FISH AND GAME

MAGIC VALLEY REGION

324 South 417 East, Suite 1

Jerome, Idaho 83338

C.L. "Butch" Otter / Governor

Virgil Moore / Director

April 14, 2011

Mary Baldwin

Idaho Department of Water Resources

1341 Filmore Street: Suite 200

Twin Falls, Idaho 83301-3380

RECEIVED
APR 15 2011
DEPT. OF WATER RESOURCES
SOUTHERN REGION

RE: Application for Permit No. 37-22624

Dear Mary:

Idaho Department of Fish and Game (Department) staff has reviewed the Application for Permit No. 37-22624 (Indian Creek Ranch Owners Association, Inc.) which seeks to appropriate 1.0 cfs from Indian Creek for diversion through two small off stream ponds for aesthetic, recreation, and wildlife use. The point of diversion and place of use are located approximately 2.0 miles north and 0.25 miles west of the center of Hailey, Idaho. The Department does not protest the Application for Permit; however, we provide the following comments for your consideration followed by issues and recommendations for consideration during the evaluation of the application.

The Department does not typically endorse construction of within-or-near channel pond projects and we have historically recommended against their construction in the Indian Creek drainage based on the concerns described below.

The practice of diverting stream flows into impoundments that are openly connected to the source streams can have direct, indirect, and cumulative impacts on stream resources. These impacts may include increased water temperatures, increased nutrient loads, habitat loss/degradation, and chemical pollution. Of particular concern is the cumulative effect of multiple impoundments in close proximity within the same drainage.

These types of effects are particularly detrimental to cold water fish populations and often lead to degraded habitat and decreased fish abundance. Impounding water exposes the water to increased amounts of sunlight and air/water interface which, in turn, heats the water prior to returning it to the source stream. Additionally, small ornamental ponds are typically managed either to maximize the aesthetic nature of the pond and the surrounding area or to manage a private fishery. Fertilizers, herbicides (both terrestrial and aquatic), and algacides are often introduced to natural streams through private pond management. Additionally, riparian vegetation – a crucial stream habitat component – is often affected by changes in stream flow or mechanical removal associated with pond construction and maintenance.

Currently, Indian Creek supports a cold water fishery but is isolated from the Big Wood River. The fishery is dominated by brook trout with a minor component of rainbow trout. Brook trout, a non-

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native, invasive species, compete with wild trout. As a result, they are not a management priority for the Department.

The Department is aware that an effort was initiated to explore possible options for reconnecting Indian Creek with the Big Wood River (as identified in the Indian Creek Initiative - see link below). If this occurs improving habitat conditions in Indian Creek for rainbow trout spawning and rearing could have a substantial positive impact on the Big Wood River fishery.

We have identified the following issues and management actions for consideration during the evaluation of the permit application.

Pond construction:

- 1) Consider isolating the ponds from Indian Creek by removing the outlet structure. This action would prevent the warmer water from being reintroduced back into Indian Creek. If an outlet is preserved, we would suggest the applicant evaluate temperature impacts.
- 2) Screen both the inlet (point of diversion) and outlet (if preserved) of the ponds to prevent entrainment of native salmonids.
- 3) Implement a buffer around the pond where herbicides and fertilizers would be prohibited.
- 4) Restore any natural riparian habitat damaged or removed during the construction process.

Water right consideration:

- 1) The seepage loss was not adequately addressed in the application. We agree a pond may naturally seal with organics and fine sediments; however, we recommend the applicant demonstrate the "no seepage" claim.
- 2) We do not support the concept of willow removal (evapotranspiration equivalent) as mitigation for evaporation losses. This action is often detrimental to riparian-dependent wildlife and can destabilize streambanks. We recommend evaluation of other actions to mitigate for evaporative losses.

Thank you for the opportunity to provide comments on the Application for Permit. Please contact Doug Megargle, Fishery Manager, or Mike McDonald, Environmental Staff Biologist, in this office if have questions or need additional information.

Sincerely,



H. Jerome Hansen
Magic Valley Regional Supervisor

Cc: Indian Creek Ranch Owners Association, Inc.
IDFG – Boise (Hebdon/Poole)
Ecc: R4 staff

Indian Creek Initiative:

http://www.mtexpress.com/index2.php?ID=2005121233&var_Year=2008&var_Month=06&var_Day=25