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WATER RESOURCES
WESTERN REGION

IDAHO DEPARTMENT OF FISH AND GAME

CLEARWATER REGION

3316 16th Street
Lewiston, Idaho 83501

C.L. "Butch" Otter/Governor
Cal Groen/Director

April 6, 2009

Mr. Larry Allen
8 Mount Idaho and Cemetery Road
Grangeville, Idaho

RE: Draft Application for Approval of Water Appropriation

Idaho Department of Fish and Game has reviewed your draft application for a permit to expand an existing pond from 8 acre feet to 16 acre feet for wildlife and fire protection. The existing pond impounds water in an unnamed tributary to Teepee Creek.

IDFG recommends against the proposed expansion of the pond unless you can provide additional information to indicate the expansion is merited for the purposes identified.

IDFG generally recommends against permitting construction of ponds that directly intercept stream channels. Small streams, including intermittent streams like that in which you propose to expand your pond, serve many important biological and hydrologic functions that deserve protection. Streams generally have greater biological complexity than ponds and, therefore, usually have greater wildlife value than ponds. In-stream impoundments contribute to elevated stream temperatures; may impede migrations of fish, amphibians and other wildlife; affect rates of recharge of waters downstream; and have other adverse impacts on biota, flow, water quality and stream hydrologic function. The existing pond likely has already had many of these impacts on the tributary. Doubling the volume and increasing the surface area of the pond is likely to exacerbate some of those adverse effects.

Water is not a limiting factor for wildlife where your pond is located; thus, expanding the pond is not likely to provide additional benefits for wildlife. Also, the existing pond should provide adequate water for fire protection for the single domicile identified in the application, as indicated in the appropriation for the existing pond. Therefore, we recommend against expanding the pond to avoid additional impacts to biota and downstream hydrology.

Thank you for the opportunity to comment. Please contact Ray Hennekey, Environmental Staff Biologist, at this office (208-799-5010) if you have any questions regarding our comments.

Sincerely,

Dave Cadwallader
Clearwater Regional Supervisor

DC /rh/gl

c: Angela Grimm, IDWR Boise (Western Region, 2735 Airport Way, Boise 83705)
Kerby Cole, DEQ Lewiston
Sharon Kiefer, IDFG HQ

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