

**IDAHO FISH & GAME**

MAGIC VALLEY REGION

868 East Main Street

P.O. Box 428

Jerome, Idaho 83338-0428

January 27, 2005

Dirk Kempthorne / Governor
Steven M. Huffaker / DirectorState of Idaho
Department of Water Resources
1341 Fillmore Street
Suite 200
Twin Falls, ID 83301-3380RECEIVED
JAN 28 2005
Department of Water Resources
Southern Region**Re: Application for Permit No. 37-21411 – Eugene Holman**

The Idaho Department of Fish and Game (Department) has reviewed the application for permit from Eugene Holman (Applicant) for 0.04 cfs of water from an unnamed spring near Townsend Gulch in Blaine County. It is our understanding the application is for stock water year round. While the IDFG has no objections to the volume of water, we do have concerns regarding development of the spring head and subsequent impacts to downstream aquatic resources. Springs and associated riparian habitats provide critical habitat for wildlife including late summer brood-rearing habitat for sage grouse, breeding, feeding and loafing habitats for a variety of passerines, reptiles, amphibians, small mammals, and mule deer, and over winter hibernacula sites for amphibians. We request the Applicant be required to fulfill the following requirements as a condition of the permit.

1. No modification or damage to the natural spring opening is permitted. Alternative strategies to divert water will be explored that have no detrimental impact on the spring opening or riparian habitat. For example, collection devices located far enough below the spring opening that it has no detrimental impact on the opening or surrounding riparian vegetation.
2. No net loss of riparian habitat will be permitted as a result of spring development. All water storage devices (troughs) will be 'demand' regulated. When there is no demand, water will remain in the natural stream channel.
3. Exclude livestock from the spring and associated channel to protect riparian vegetation and water quality.

Thank you for the opportunity to provide comment. If you have any questions please contact Mike McDonald, Environmental Staff Biologist, at this office.

Sincerely,

David Parrish

Magic Valley Regional Supervisor

Cc: Eugene Holman (Applicant)
IDFG (NRPB)
ECc: IDFG (Region 4 staff)