

**IDAHO FISH & GAME**

MAGIC VALLEY REGION
868 East Main Street
P.O. Box 428
Jerome, Idaho 83338-0428

August 24, 2004

Dirk Kempthorne / Governor
Steven M. Huffaker / Director

Corey Skinner
Department of Water Resources
1341 Fillmore Street
Suite 200
Twin Falls, ID 83301-3380

RECEIVED

AUG 26 2004

Department of Water Resources
Southern Region

Re: Pending Applications for Transfer of Water Rights: 69269 (Riverview-Cloverly Irrigation), 69272 (Rinker Company), and 69308 (Rinker Company)

The Idaho Department of Fish and Game (IDFG) has toured the sites and reviewed the pending applications for transfer from Riverview-Cloverly Irrigation and the Rinker Company. It is our understanding the applications are intended to change the points of diversion and recorded places of use for approximately 4.81 (Transfer No. 69269) and 0.126 (Transfer No. 69272 and 69308) cfs of irrigation water from the Big Wood River in Blaine County. We understand it is the intent of each transfer to change the points of diversion to upstream locations. Specifically, Transfer No. 69269 proposes to move the point of diversion from a head gate located at the north edge of Section 32, Township 3 North, Range 18 East (Purdum #25 head gate) to the head of Purdum Slough approximately 1.3 miles north. Transfer No. 69272 and 69308 propose changing the place of use and point of diversion from Purdum #25 head gate to the Little Mackawao side channel approximately 3.5 miles north. We offer the following comments and recommendations for your consideration.

The Big Wood River maintains a highly productive and extremely popular cold water fishery. Side channels associated with the Big Wood provide important habitat for a variety of fish and wildlife including salmonid juvenile rearing and adult spawning habitat and breeding, nesting, and roosting habitat for migratory songbirds, raptors, small mammals, and other nongame wildlife. In addition, side channels and associated riparian vegetation provide important migration corridors for large and small animals, provide connectivity between diverse types of habitat, help dissipate runoff and reduce the impacts of downstream flooding, and serve as depositional zones for sediment.

The IDFG has documented the presence of juvenile salmonids in Purdum Slough, a side channel of the Big Wood River (Megargle 1999). While we have not specifically sampled the Little Mackawao side channel, we suspect it also provides juvenile rearing and spawning habitat for resident salmonids. Any modification in water management that reduces discharge through these side channels will reduce the availability of suitable habitat for juvenile and adult salmonids in the Big Wood system.

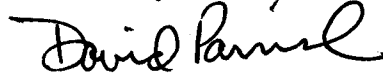
The IDFG is concerned that decreasing flows in segments of the Big Wood River by moving points of diversion upstream will adversely impact resident salmonid populations. Research has shown in normal water years, existing diversion structures and canals in the Big Wood system do

not significantly impact fish recruitment. However, additional diversion structures increase the vulnerability of juvenile fish to entrainment. Any additional loss of juvenile fish through entrainment coupled with the decreased availability of rearing and spawning habitat could ultimately impact recruitment and subsequently reduce resident fish populations. In addition, decreased side channel flows and associated negative impacts to riparian vegetation will limit the availability of breeding, nesting, and roosting habitat for wildlife. Finally, the installation of diversion structures at the head of side channels will ultimately compromise their ability to dissipate flood flows and provide a depositional zone for sediment.

We recommend against issuance of permits to change existing points of diversion to upstream locations. Further, we do not support issuance of permits that enable applicants to install additional permanent diversion structures on the Big Wood or its associated side channels.

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

Sincerely,



David Parrish

Magic Valley Regional Supervisor

Cc: IDFG (NRPB)
ECc: IDFG (R4 staff)

Literature Cited:

Megargle, D.J. 1999. Irrigation Diversion Fish Loss Reduction; Subproject 1: Big Wood River and Silver Creek Investigations. Annual Performance Report F-73-R-21. Idaho Department of Fish and Game.