IDAHO DEPARTMENT OF FISH AND GAME
CLEARWATER REGION
3316 16th Street
Lewiston, Idaho 83501

C.L. "Butch" Otter / Governor
Virgil Moore / Director

July, 18 2017

Mr Tim Luke
Idaho Department of Natural Resources
322 East Front Street
PO Box 83720
Boise, ID 83720

Dear Mr. Luke:

Re: STREAM CHANNEL ALTERATION PERMIT APPICATION IDWR #S82-20066
Richardson Red River

IDFG has reviewed the joint permit application, maps, diagrams and other attachments provided by Gay Richardson requesting to alter the stream channel in Red River through use of a 4" hose suction dredge. Our comments herein, are offered not to support or oppose the proposal, but to provide a technical review of the potential effects of this proposal on wildlife, fish and habitat.

The applicant proposes operation of the suction dredge within a 150 ft. section of Red River. The dredge would be operated to clear existing substrate down to bedrock with an estimated 30 cubic yards of material being removed. All operations would be conducted on U.S. Forest Service ground.

We have long-term fisheries monitoring data in Red River. Based upon this data and associated knowledge of the area proposed for mining, it is our opinion that mining cannot occur in Red River without adverse impacts to one or more life stage of ESA-listed steelhead and bull trout, Idaho state-listed species of concern Pacific lamprey and Westslope Cutthroat trout, spring Chinook salmon, and other native fish and aquatic biota. Impacts are also unavoidable to designated Critical Habitat for ESA-listed Bull Trout and steelhead.

IDFG has conducted redd counts for spring Chinook salmon, operated a juvenile rotary screw trap in the vicinity of the proposed project for many years, and conducts long-term snorkel monitoring within Red River. Spring Chinook redd counts annually document spring Chinook salmon spawning in vicinity of the proposed project. The reach downstream of Gold Point typically has some of the highest redd densities in the lower reach of Red River. Spring Chinook adults typically begin to arrive in Red River in late May and remain until spawning in late August and September. In some years, emergence can last into mid-July and juveniles are present year round.

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Redd counts are not conducted for steelhead in Red River, but excellent spawning habitat is present in the project reach. It is our opinion that steelhead spawning and rearing takes place in the project reach. IDFG snorkel surveys conducted in late June – August have documented juvenile steelhead within lower Red River. Steelhead typically being to enter Red River in April; spawning takes place in May and June; and juveniles are present in the project reach year-round.

Pacific lamprey and Westslope Cutthroat Trout are present year-round. Westslope cutthroat trout spawn in spring; adults and juveniles are present in the project reach year round. Past surveys indicate that anadromous Pacific lamprey spawn in Red River; juvenile lamprey (ammocoetes) rear in sands and fine substrate for several years before emerging to out-migrate.

Bull trout utilize the reach for migration, rearing and residence. Bull trout are unlikely to be in the project area during the in-water work window given water temperature limitations that time of year. However, the reach is utilized by Bull trout throughout the spring, fall, and winter.

Potential impacts of the proposed mining to fish could be temporary and/or long-term and vary in severity. We expect localized disturbance or displacement of adult and juvenile fish in proximity of mining and site preparations. Disturbance from mining may also interfere with or interrupt adult fish migration through the mining area. Discharges of sediment could displace fish and could affect spawning gravel embeddedness downstream. Depending on timing and location of mining activities, salmon, steelhead, or cutthroat trout redds could be destroyed and eggs or fry entrained by the dredges. The narrow, confined nature of Red River in the project reach would exacerbate all impacts and would largely prevent avoidance of those impacts.

We would like to close our comments by pointing out that Red River was designated as a State Recreational River in the South Fork Clearwater River Basin Comprehensive Water Plan (Water Plan) approved in 2004 by the Idaho Water Resources Board and affirmed by the Idaho Legislature in 2005. The Water Plan prohibits dredge or placer mining in Recreational Rivers to protect the public's' interest in the special aquatic resource values in Red River, including fisheries.

Thank you for the opportunity to comments. Please contact Brett Bowersox, Clearwater Region, Fishery Staff Biologist, if you have questions or would like to review pertinent fish survey data collected by IDFG for Red River.

Sincerely.

Jerome Hansen

Jerome Hansen
Clearwater Regional Supervisor

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