December 19, 2017

Idaho Department Water Resources  
322 East Front Street  
Boise, ID 83702  

Attn: IDWR Deputy Director Mathew Weaver

Dear Mathew:

Idaho Department of Fish and Game (Department) attended the December 5, 2017 public listening session regarding suction dredge mining in the South Fork Clearwater River. We also reviewed the two Idaho Department of Water Resources (IDWR) memos prepared for the December 5, 2017 meeting. The first memo reviewed the 23 Special Supplement Permit conditions for small scale suction dredge mining on the South Fork Clearwater River. The second memo reviewed the 15 Special Supplement Permit limit.

The purpose of these comments is to assist you by providing technical information addressing potential effects to wildlife, fisheries, and habitats and how any adverse effects might be avoided, minimized, or mitigated. It is not the intention of the Department to support or oppose the conditions. Resident species of fish and wildlife are property of all Idaho citizens. The Department and the Idaho Fish and Game Commission are expressly charged with statutory responsibility to preserve, protect, perpetuate and manage all fish and wildlife in Idaho (Idaho Code 36-103(a)). In fulfillment of our statutory charge and direction as provided by the Idaho Legislature, we offer the following comments and recommendations.

As stated in the South Fork Clearwater River Basin Plan, the South Fork Clearwater River basin contains a significant amount of high to very high potential fish habitat and is an important area for fish species within the broader context of the Columbia River basin. The South Fork Clearwater River basin provides habitat for ESA listed species (fall Chinook Salmon, steelhead, and Bull Trout) and Idaho Endangered or Sensitive Species (Pacific Lamprey, Redband Trout, spring Chinook Salmon, and Westslope Cutthroat Trout). In addition, the South Fork of the Clearwater River is recognized as an important fishery which provides unique opportunity for anglers.

The Department recognizes the 23 Special Supplement Permit conditions and the 15 Special Supplement Permit limit as a compromise which facilitates recreational suction dredge mining as defined in the 2004 South Fork Clearwater River Basin Plan, while attempting to limit adverse effects to fish and wildlife. If changes are proposed to the Special Supplement Permit conditions...
and limit, the Department recommends a thorough environmental analysis be conducted. In addition, we request that scoping of the changes occur as early as possible, allowing adequate time to review the proposed changes before the 2018 season. Our staff would like the opportunity to discuss and review any potential changes. Our staff is also available to provide available fisheries and wildlife science as needed to help inform potential changes.

Thank you for the opportunity to discuss and comment on the Special Supplement Permit conditions and limits related to recreational suction dredge mining in the South Fork Clearwater River. If you have further questions please contact Zach Swearingen, Environmental Staff Biologist, at 208-799-5010.

Sincerely,

Jerome Hansen
Clearwater Regional Supervisor

cc: Gary Vecellio