

## Weaver, Mathew

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**From:** Gay Richardson <gayrichardson@idaho.net>  
**Sent:** Tuesday, June 22, 2021 5:09 PM  
**To:** RulesInfo  
**Subject:** IDAPA 37.03.07 SCA Rule 61 Strawman Draft v2.0

02. When you specify 5 inch nozzle this continues to confuse dredgers and even people in other agencies ( for instance just recently IDEQ ). They think you can only use a 5 inch suction dredge when in fact a 5 inch nozzle is a 6 inch hose dredge. Dredge manufacturers go by hose size and most dredgers. This has been talked about a number of times before and it would be nice if we all were on the same page. The 15 H.P. limit also causes problems and controversy. For instance; if you buy a Proline dredge ( a popular dredge ) it comes with 2 - 8 H.P. engines so you are 1-H.P. over the limit. This should have been tossed out years ago when Irvin Balloue and the fellow who built dredges on the Salmon River came up with this. I explained in detail some years ago in letters to IDWR about all this; please refer to those letters if you still have them.

03. No use of powered equipment below high water mark except for dredge and life support system. Because of the position that ICL and other environmental groups take on this this should be included. Many use hydraulic nozzles powered by the dredge pump or rarely by another engine to provide power for the hydraulic to loosen hardpack and clean bedrock and crevices so this should be included plus non-powered hand tools and at least a non-powered come along which we have all been using for years. In relation to moving boulders a few years ago with Tim Luke (IDWR) and Ray Hennekey ( Idaho F&G Lewiston) up on the Red River we got into discussing moving boulders using power winching so I asked Ray Hennekey do you have any pattern or placement you would like to see. Ray gave no answer. Nature puts these boulders in the river at random and this was mentioned to Ray.

I don't see anything else to comment on at this time especially that this is for a letter permit.

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