Idaho Rivers United - PO Box 633 - Boise, ID 83701 - (208) 343-7481 - idahorivers.org

Protecting and Restoring the Rivers and Fish of Idaho

Re: Mike White Channel and Culvert Relocation #66495

To Whom it May Concern,

Idaho Rivers United (IRU) is writing in support of the proposed channel relocation and new AOP culvert installation in Mike White Creek.

IRU is a 501(c)3 nonprofit environmental advocacy organization that is dedicated to protecting Idaho rivers and restoring our native fish populations. For almost 30 years, IRU has been working to defend Wild and Scenic rivers, advocate for endangered salmon and steelhead populations, reform hydropower policy, and promote enhanced water quality in Idaho's rivers.

Habitat restoration projects that improve fish passage ensure that Lolo Creek, ESA-designated critical habitat Snake River steelhead, will better serve its intended conservation role. The culvert design, as described in the scoping letter, will improve upon the undersized existing CMP culvert., thus better providing safe, timely, and effective fish passage consistent with NMFS legal responsibilities. We particularly commend the proposed rerouting of 350' of Mike White Creek into its historic channel, coupled with the installation of the features outlined in the Lochsa Scoping Package document. Upper Lolo Creek is designated as a "key watershed" under PACFISH standards, and a "conservation watershed" under the 2023 Nez Perce-Clearwater Land Management Plan.Any restoration action that improves ESA-listed fish passage in important spawning and rearing habitat for salmonids is strongly supported by IRU.

We recommend the culvert design and channel relocation follow the Streambed Simulation design method as outlined in NOAA's stream crossing guidelines for salmonids[1], if it is not already. This method is the recommended option in spawning habitat by NOAA, as it effectively maintains the ecological function of the stream and allows for the natural function of fish passage, sediment transport, and flood and debris conveyance. Additionally, the Forest Service should adhere to specifications such as a scour prism of 1.5 times bankfull width of the creek. Certain characteristics, such as if Mike White Creek is predominantly controlled by wood and debris, would necessitate the design width of the culvert to exceed the Streambed Simulation standard by a factor of safety, or the width to be supported by hydraulic modeling.

We appreciate the opportunity to provide comment, and reiterate our support for this project and others like it that improve ESA-listed salmonid passage in critical habitat.

Sincerely,

Stephen Pfeiffer
Wild Fish and Hydro Policy Manager
Idaho Rivers United
stephen@idahorivers.org

[1] Guidelines for Salmonid Passage at Stream Crossings in Oregon, Washington, and Idaho. NMFS (National Marine Fisheries Service). (2022). WCR. Portland, Oregon.