



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE RESOURCES

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29 March, 2001

Department of Environmental Quality
Division of Drinking Water
P.O. Box 144830
Salt Lake City, UT 84114-4830

Attention: Ken Wilde

Subject: Emigration Improvement District, Water System Expansion Project

Dear Mr. Wilde:

We have reviewed the information sent to us regarding Emigration Improvement District's (EID) proposal to build new and consolidate existing water systems in the upper end of Emigration Canyon. The primary purpose of the project, as we understand, is to provide reliable drinking water to existing homes and to expand the water system for present and future development.

Our primary concern for this water development is the potential for depletion of flows in the headwaters of Emigration Creek and its tributaries. Results from recent genetic studies have shown that a 'core population' of Bonneville cutthroat trout, a State Conservation Species, is found in Emigration Creek (prior to these studies, the cutthroat trout from Emigration Creek were thought to have the potential to be pure Bonneville cutthroat). Populations of Bonneville cutthroat which are more than 99% pure, are designated as 'core populations', whose habitat and genetic integrity should be protected. 'Conservation Species' are those wildlife species or subspecies currently receiving sufficient special management and protection by various resource agencies* under a Conservation Agreement to preclude its becoming listed as a Threatened or Endangered species. The Conservation Agreement and Strategy for Bonneville Cutthroat Trout in the State of Utah (1997) identifies water development and diversion of stream flows as one of the greatest causes of habitat loss or degradation for this species.

Your brief description of this project does not indicate current and historic flow patterns in the Emigration Creek and its Burr Fork, Killyon Canyon, and other tributaries, and future flow patterns under the proposed housing and water developments, and their effects on the stream and riparian environment. Information is also lacking regarding sources of water for the future development.

Based on the information provided to us, we have serious concern about the apparent loss of habitat (stream flows and riparian environment) for Bonneville cutthroat trout which will likely occur if this project were to proceed.

Please contact our Habitat Manager, Doug Sakaguchi, at our Central Region Office in Springville, UT at 801-489-5678, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "David Hintze". The signature is written in a cursive style with a large, stylized "D" and "H".

David N. Hintze
Regional Supervisor

*Resource agencies signatory to the Conservation Agreement and Strategy for Bonneville Cutthroat Trout in the State of Utah, include: Division of Wildlife Resources, Fish and Wildlife Service, Bureau of Land Management, Bureau of Reclamation, Forest Service, Utah Reclamation Mitigation and Conservation Commission, and the Confederated Tribes of the Goshute Reservation.