United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Challis Field Office
1151 Blue Mountain Road
Challis, Idaho 83226

In Reply Refer To:
4130/8120/IDI-37646 (IDI030)

December 13, 2013

Dear Interested Public:

You are receiving this letter because you have been identified by the Bureau of Land Management (BLM) Challis Field Office (CFO) as an interested public for the P-16/Furey Lane Water Conservation and Reconnect Project. The project proponent is Custer Soil and Water Conservation District. The project applicants, related to BLM Rights of Way, are Big Creek Ranch LLC and Mr. Ted O'Neal, along with Idaho Department of Fish and Game. The P-16 diversion is a major diversion on the Pahsimeroi River, located approximately 2.25 miles upstream of Furey Lane. Currently the diversion consists of an instream earthen push-up dam that diverts water from the river and into a surface ditch, which presents migration and entrainment issues for resident and anadromous fish species during nearly all flow levels. During late summer low flow, the P-16 diversion captures the entire volume of the Pahsimeroi River, exacerbating fish entrainment. The proposed project described below would minimize fish entrainment issues and increase Pahsimeroi River discharge below the P-16 diversion, allowing for restoration of habitat and riparian vegetation in that reach. The purpose of this letter is to update and inform interested and affected parties of the proponent's proposed action and to solicit comments to assist with the National Environmental Policy Act (NEPA) analysis and formulation of issues. Analysis of the proposal is ongoing, and will be documented in an Environmental Assessment [(EA); NEPA# DOI-BLM-ID-1030-2014-0002-EA)] with scheduled completion during the summer of 2014. Comments received in response to this solicitation will be used to identify potential environmental issues related to the proposed action and to identify and refine potential alternatives to the proposed action.

Purpose and Need for Action

Water diversion and irrigation has been occurring in the Pahsimeroi Valley since the late 1800's when Euro-American settlers entered the valley. Many irrigation diversions are instream push-up dams which feed into unscreened ditches. These pushup dams present migration barriers for anadromous and resident fish species and limit full utilization of available habitat within the drainage, and can also cause entrainment and subsequent mortality to fish within irrigation systems. The proponent's goal is to increase irrigation system efficiency and minimize fish entrainment within the P-16 irrigation system, while increasing instream flows and improving

habitat quality and connectivity in the Pahsimeroi River below the existing P-16 diversion. This would be accomplished through reconstruction of the P-16 diversion and irrigation system.

The purpose of this action is to provide access to the Right-of-Way (ROW) applicants to install and maintain the irrigation diversion, National Marine Fisheries Service (NMFS) compliant fish screen, and pipeline. Additionally, the purpose of this action is to improve riparian habitat quality and accessibility for anadromous and resident fish species through instream flow augmentation within the Pahsimeroi River in the vicinity and downstream of the reconstructed P-16 diversion.

The need for the action is established by the BLM's responsibility under the Federal Land Policy and Management Act (FLPMA) to respond to requests for legal access across public lands administered by the BLM, and is in accordance with the Challis BLM Resource Management Plan (RMP). Additionally, the need is to capitalize on the opportunity presented by willing landowners to increase irrigation efficiency, improve habitat through increased flows, and minimize entrainment of anadromous and resident fish species within the current irrigation system. This project will result in a net water savings of approximately 28 cubic feet per second (cfs) on the Pahsimeroi River. However, as a direct result of this water savings, the applicants will discontinue use of the Hamilton ditch and most of the length of the existing P-16 diversion ditch, which are primary sources of wildlife and livestock water within the BLM County Line Allotment. Because of this, there is a need to replace or augment the wildlife and livestock water sources that would be removed through the discontinuation of these historic irrigation conveyances.

Preliminary Description of Proposed Action

The proponent has proposed an irrigation efficiency project at the current P-16 diversion on the main stem of the Pahsimeroi River in Lemhi County, Idaho. The attached map depicts the proposed action, including: 1) Reconstruction of the existing P-16 diversion from an in-stream push-up dam type diversion to a headgate diversion; 2) Designed bank reconstruction and rehabilitation at the proposed point of diversion; 3) Installation of a NMFS compliant fish screen just downstream from the point of diversion, and; 4) Installation of approximately 7,228 feet of buried pipeline below the fish screen to convey irrigation water across BLM administered land to private land irrigation pivots. The reach of the Pahsimeroi River below the P-16 diversion currently has non-perennial flow, both as a result of natural channel loss and irrigation withdrawal. This reach would benefit from an increase in flow as a result of this project for most of the year, but the critical benefits would occur during late summer when the channel is typically dry due to the diversion at P-16. It is anticipated that the channel and the adjacent riparian corridor would respond readily to the increased duration of surface water as a result of this proposed project, therefore in order to protect the irrigation headworks infrastructure and the recovering riparian vegetation; a standard BLM 4-wire fence would be constructed along this reach of the Pahsimeroi River to exclude livestock. The proposed project would occur both on land administered by the BLM and on adjacent private lands.

Preliminary Issues

Table 1. Issues Identified Through Internal Scoping for the P-16/Furey Lane Water Conservation and Reconnect Project.

Resource	Resource Issue
Historic Properties	How will the proposed action and alternatives impact historic properties that may be present in the action area?
Threatened, Endangered, and Sensitive Fish; Fisheries	How will designated critical habitat for Chinook salmon, steelhead, bull trout and Essential Fish Habitat (EFH) be affected in the action area reach of the Pahsimeroi River and downstream from short term impacts related to diversion removal, reconstruction, and associated riparian restoration activities? Are juvenile or adult Chinook salmon, steelhead, bull trout, or other native salmonids (rainbow trout, westslope cutthroat trout) likely to be present in the action area reach of the Pahsimeroi River? How will these individuals be affected from short term impacts related to diversion removal, reconstruction, and associated riparian restoration activities? How will designated critical habitat for Chinook salmon, bull trout and EFH in the action area reach of the Pahsimeroi River be affected by the project further in time when hydrologic connectivity and restored instream flows occur. How will Chinook salmon, bull trout, steelhead, and other native and non-native salmonids in the action area reach of the Pahsimeroi River be affected by the project further in time when hydrologic connectivity, fish passage and restored instream flows occur.
Invasive /Non-native Species	How will the proposed action and alternatives impact the abundance and distribution of invasive/non-native species?
Economic and Social Values?	How will the project impact the local and regional economy including agricultural practices within the Pahsimeroi Valley? How will the Proposed Action economically impact the permittee due to increased livestock management including water hauling and riding? How will increased fence/stockwater trough system maintenance economically impact the permittee?
Migratory Birds	How will proposed fencing and ground disturbance (removal of vegetation) impact migratory birds?
Native American Religious Concerns	How will the proposed action and alternatives impact Native American religious concerns within the action area?
Soils	How will the proposed action effect long-term viability of soils (productivity, infiltration, ground cover)?
Threatened, Endangered, and	How will the proposed action and alternatives impact sage grouse habitat including designated Preliminary Priority Habitat (PPH) in the

Sensitive Animals/ Wildlife	project area? Specifically, how will fencing density and design, and amount of disturbance in mapped habitat impact sage grouse habitat? How will vegetation removal and burrow disturbance potentially impact pygmy rabbits that may be present in the project area? How will the construction and placement of supplementary stock/wildlife troughs affect sage grouse?
Range Resources	How will the proposed project alter grazing patterns due to water development/availability from the loss of Hamilton ditch water source? How will the change in grazing patterns alter upland vegetative species within the allotment?
Tribal Treaty Rights and Interests	How will access to and utilization of treaty- reserved resources be impacted by the proposed action and alternatives?
Vegetation	How will the proposed action and alternatives impact existing vegetation composition?
Water Quality	How will the proposed action and alternative(s) impact water quality (specifically temperature and sediment) in the Pahsimeroi River? How will sediment and erosion be mitigated both during and following implementation of the proposed action? Would the proposed action and alternative(s) be in compliance with the existing TMDL for the Pahsimeroi Subbasin? How will instream flows downstream of the new P-16 headworks be affected by the proposed action and alternative(s)?
Wetland Riparian Zones	What wetland/riparian species and vegetation types would be disturbed/created as a result of the proposed action? What will be the net gain/loss of wetland and riparian areas as a result of implementation of the proposed action?

Decision to be Made

The Challis Field Manager is the official responsible for decisions regarding the management of BLM administered lands within the project area. Based on the results of NEPA analysis, the Field Manager will determine if the action would have significant effects; if so, an Environmental Impact Statement (EIS) would be prepared. If the action would not have significant effects, a Finding of No Significant Impact (FONSI) would be prepared. Following appropriate NEPA analysis, the Field Manager would issue a decision document or documents consistent with 43 CFR 2800 for FLPMA ROW, 43 CFR 4160 for grazing administrative remedies, 43 CFR 4120.3-2 for cooperative range improvement agreements and 43 CFR 4120.3-3 for range improvement projects. Decisions which may be issued include: 1) A decision to approve or deny the project proponent's proposed activities related to P-16 diversion, including associated bank rehabilitation or enhancement, fence construction, wildlife/stockwater system construction and/or reconstruction, as well as any other temporary anticipated disturbance to BLM administered lands; 2) Other terms and conditions intended to ensure conformance with the Challis RMP and minimize, avoid or offset impacts to affected resources (Table 1); 3) A decision to approve or deny a FLPMA ROW request by the private land owners and Idaho Department of Fish and Game to allow for adaptation of their irrigation system necessary to utilize increased efficiency to maintain irrigated lands and allow for reconnection of surface water in the Pahsimeroi River below the existing P-16 diversion; 4) Other ROW stipulations that ensure adherence to Idaho Statutes, conformance with the Challis RMP, and minimize, avoid, or offset impacts to affected resources (Table 1).

The factors to be considered when selecting from alternatives would be:

- The degree to which the alternative(s) meet the purpose and need for action.
- The nature and intensity of environmental impacts that would result from implementation and the expected effectiveness of related mitigations.
- The degree to which the alternative(s) are consistent with the IM-2012-043 Greater Sage-Grouse Interim Management Policies and Procedures.
- The degree to which the alternative(s) are consistent with ESA responsibilities for bull trout, steelhead, Chinook salmon and their designated critical habitat and if the alternative is able avoid any adverse effects.
- Compliance with the Challis Resource Area Resource Management Plan (RMP).

Public Input Needed

Comments are specifically requested on the proposed action, preliminary issues, and alternatives. Comments made on this proposal would be most helpful if they are received by January 13, 2014, and are directly relevant to the proposal and project area. The BLM will not reject public feedback outside established public involvement timeframes; however, these comments may be considered secondary to comments received in a timely manner and may only be assessed to determine if they identify concerns that would substantially alter the assumptions, proposal, design, or analysis presented in the EA.

This scoping letter and future documents will available at the following ePlanning website:

https://www.blm.gov/epl-front-office/eplanning/lup/lup_register.do

Comments should be sent to the Challis Field Office at 1151 Blue Mountain Road, Challis, Idaho 83226. Please identify whether you are submitting comments as an individual or as the designated spokesperson on behalf of an organization. Issues that are outside the scope of the proposal will not be addressed at this planning level.

Map

A map depicting the P-16/Furey Lane Water Conservation and Reconnect design concept and land ownership is enclosed with this letter.

If you have any questions, please contact me or Mike Whitson, CFO Hydrologist at 208-879-6215 or by email at mwhitson@blm.gov.

Sincerely,

Todd Kuck
Field Manager

Enclosure