

PUBLIC SCOPING COMMENTS

This list—in no particular order—was compiled from written comments collected during public scoping meetings and comments mailed to Reclamation. These scoping comments assisted Reclamation to identify issues associated with the Federal action.

Water Supply

- Include information on the changes from flood to sprinkler irrigation and the effects on ground water and river flows. If data is not available, it should be researched.
- Ground water information and history should be summarized and included.
- Minimum flow increases and decreasing the size of the minimum storage pool should be considered.
- Concerned with low winter flows below the dam.
- Impacts for all water, both “storage” and “natural flow”, used in the past 40 years needs to be quantified and disclosed.
- High volume releases from CCR during the winter increase the cumulative impact of the inverted hydrographs.
- The impacts of conversion from flood to sprinkler based irrigation systems needs to be quantified, disclosed and mitigated.
- Operation of Clark Canyon and Barretts, water delivery, and recreational uses need to be considered in how they affect the entire Missouri River.
- Recommend that Reclamation conduct a comprehensive stream flow study as part of this process to determine how the operations, delivery, and recreation use have changed the environment from 1960, and how those impacts are mitigated.
- How have changes in the usage of waters in the EBID affected the accretions and return flows to the various valley streams?
- How have changes in the usage of water in the EBID affected the availability of water for valley and west bench users?
- Reclamation should look at the water usage issue between the East Bench ID and Clark Canyon Water Supply Company.

Water Quality

- Evaluate how sediments and nutrients affect fish, aquatic insects, and water quality.
- Consider putting small marshes on the lower ends of drain ditches to collect sediment and nutrients.
- Consider running water through the ground to cool it. Consider installing short fish spawning channel with suitable gravel on outlet. Consider short duration flushing flows during spring to flush sediment and nutrients, provide clean gravel, and maintain the channel.
- The Beaverhead River is listed as “impaired” for TMDL assessment and that information and possible results should be included in the review.
- The lower Beaverhead and upper Jefferson suffer sedimentation, low flows, channel atrophy, and other problems due to the dam operations and a full review of the operation should be conducted.
- Regular high flow releases should be considered for improvements/maintenance to the main channel.
- Concern over the water quality from irrigation return flows with sedimentation and nutrients.
- Recommend operations that accommodate periodic releases that mimic full bank events.
- Minimizing canal seepage would have positive affects on sedimentation, nutrients, and river flows.

Fisheries

- Fisheries values, wildlife values, riparian, and wetland habitats should all be considered and incorporated.
- Effects of Jefferson drainage dams as barriers to Arctic grayling migration and habitat selection.

- Keep in mind the general health of the fisheries.
- How have CCR and BDD operations impacted wetlands and riparian habitats and dependent species?
- How has the loss of flood irrigation in the EBID, West Bench and valley impacted wetlands and riparian habitats and dependent species?
- The fish industry needs to be set aside until the drought conditions allow for better flows.

Wetlands

- Fisheries values, wildlife values, riparian, and wetland habitats should all be considered and incorporated.
- How have CCR and BDD operations impacted wetlands and riparian habitats and dependent species?
- Do CCR and BDD operations, recreation uses and water deliveries achieve compliance with 1977 EO to protect wetlands and the goal of “no net loss of wetlands”?
- What are the cumulative effects of CCR and BDD operations, recreational use and water deliveries on wetlands, riparian areas and dependent species?

Wildlife

- Fisheries values, wildlife values, riparian, and wetland habitats should all be considered and incorporated.

Social and Economic

- Discuss the economic values of fisheries, recreation, tourism, and their compatibility to agriculture and local communities.
- Conduct an economic study to estimate the value of an improved fishery in the Beaverhead and Jefferson Rivers.
- Recommends the economic analysis to consider economic activity rather than jobs or job creation.
- Any economic models or assumptions used by Reclamation need to be fully disclosed and reality based.
- The impacts could be analyzed by considering “low income wage earners/consumers/taxpayers” as previously suggested as one of the affected groups.

Recreation

- How has recreation impacted wetlands and riparian habitats and dependent species?

Water Rights

- All irrigation wells with junior filing date to East Bench need to be shut down until East Bench receives its full contract allotment.
- Irrigation wells are a huge concern and need to be addressed. Those wells are taking water out of the aquifer that normally would return to the Beaverhead River.
- During drought years, the senior water right holders should only be entitled to the summertime inflows, or a prorated amount of water based on their percentage of payment on the CCD project.
- Expanded fields with junior water rights should be shut off prior to East Bench senior rights.
- It is unacceptable for non-signers to get full allotment of water when the inflows were not enough to satisfy their needs.
- Something needs to be done to ensure that the EBID does not surreptitiously infringe on the water rights of others, including both storage and natural flow users.
- Is adequate storage water being released from CCR so as not to infringe on the rights of others?
- Is storage water being released in a timely manner from CCR so as not to infringe on the rights of others?
- Have changes in the usage of water in the EBID diminished the water rights of any water user?
- How have changes in the usage of waters in the EBID affected the accretions and return and their eventual usage by other water right holders?

Water Conservation

- Discuss water losses and conservation.
- The East Bench canal should be lined.
- Line more ditch in the valley.
- More water measuring devices.

- Irrigation improvements (canal sealing, removal, consolidation) should be made and aerial photography should be obtained to assist the effort.

Miscellaneous

- Consider impacts that the proposed action may have on flood control regulation. A capacity curve may need to be revised to ensure available storage has not diminished or downstream channel capacities have changed.
- The USBR has an affirmative obligation for consistency with state, tribal and local laws and plans. There is nothing in the process to date demonstrating that USBR has satisfied the various federal consistency requirements.
- Management failures need to be quantified and fully disclosed in the contract renewal NEPA documents.
- The contract renewal process should make noxious weed control a top management priority.
- NEPA requires full disclosure.
- The racial/ethnic list in OMB Directive 15 be considered a minimum, or a starting point from which to begin the analysis.
- The EJ analysis should follow the *Grutter* standard of individualized consideration by looking at the specific document, facts, and situation in completing the EJ determination if any group is bearing a disproportionate share.
- If Reclamation will use absolute legal minimum for EJ, then the NEPA documents disclose why the absolute min. EJ standard was used while other portions of the process go well beyond the legal minimums.
- The reservoir should be managed based on this multi-dimensional benefit to the entire region. A diverse management plan for the next 40 years would certainly benefit the greater good, now and in the future.
- Increase useable storage in Clark Canyon by decreasing the size of the Flood Control Pool.
- Show how Reclamation is going to change management if needed over shorter intervals. You should improve policy and extend the longevity of this project with periodic reviews and needed changes every 3 to 5 years.
- Reclamation should be obligated to make necessary provisions for relief since the Bureau was the author of the contract that the farmers have to live by.
- Inadequate water causes inadequate production which causes lack of funds.
- Adjustments need to be made to the new contract in the event when there is a drought.
- It is imperative that we keep all the acres under irrigation and need to keep our 4 acre ft allotment or water or we can not exist.
- Need drought water management program in the new contract.
- I like the extended acres in the new contract.
- Full justification should be provided for any proposed increase in acreage under irrigation.
- Impression that irrigated acres could be expanded as long as the volume of water was not exceeded. In favor of renewing contract on volume basis allotted rather than strictly on contracted acres.
- Are the EBID shareholders and relationships between shareholders in compliance with Reclamation Reform Act acreage limitations?
- Given the cumulative changes of the irrigation systems on the West Bench and in the valley, is the EBID viable at its current size?
- Reclamation should disclose and non-compliance and take corrective actions to ensure compliance with laws.