U.S. Department of Homeland Security
FEMA, Region X
130 228th Street, SW
Bothell, WA 98021-8627

FEMA

FINDING OF NO SIGNIFICANT IMPACT

Forest Road 227 Realignment (Bowns Washout) Project, Camas County, Idaho
Public Assistance Project Worksheet No. 034
FEMA-4333-DR-ID

Camas County, Idaho has applied for funding under the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) Public Assistance Grant Program for a road relocation project. The Public Assistance Program is authorized under Section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 (Public Law 93-288, as amended, 42 U.S. Code § 5121-5207) and is administered by the Idaho Office of Emergency Management. Public Assistance grant funds are available from the August 27, 2017, Presidential Major Disaster declaration FEMA-4333-DR-ID.

The County requested funds to realign two segments of Forest Road (FR) 227 around washouts caused by flooding from Big Smokey Creek in 2017 west of Bowns Campground. The project will realign approximately 3500 feet of FR 227 further away from Big Smokey Creek, remove and obliterate approximately 2,200 feet of the existing FR 227 road that is no longer needed, and rehabilitate approximately 760 feet of a new side channel of Big Smoky Creek where FR 227 previously existed.

This project is cosponsored by the US Forest Service (USFS), Camas County, and FEMA. An environmental assessment (EA) was completed by the USFS and a Supplemental to that EA was completed by FEMA in January 2020.

In accordance with the National Environmental Policy Act (NEPA) of 1969 and FEMA's implementing regulations, FEMA Reviewed the USFS EA and prepared a Supplemental EA to identify and evaluate potential environmental impacts resulting from the alternatives presented in the EA and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). Three alternatives were described and analyzed in detail within the EA: The 1) No Action, 2) Rebuild FR 227 in Place, and 3) Realign FR 227, the proposed Action. Four additional alternatives were considered but eliminated from further analysis based on the findings that they did not fully meet the purpose and need of the project, were unfeasible, or cost prohibitive. The proposed action is the preferred alternative and was selected for public access and manageability, and its relocation out of the floodplain. Other alternatives were considered but not carried forth and are described further in the EA.

Camas County and the USFS provided opportunities for involvement to the public and other agencies between January 16, 2018 and March 2, 2020. Two public meetings occurred and comments were received as well as comments sent in to the USFS. The formal 30-day notice and comment period on the USFS EA and FEMA SEA occurred from January 31 – March 2, 2020 via a letter announcing the 30-day 'Notice of Proposed Action' comment period along with instructions on where to find the EA and SEA, as well as posting on the Sawtooth National

Forest public website. Two comment letters were received during the 30-day comment period and comments were addressed by the USFS.

FINDINGS

Based upon the referenced USFS EA, the attached FEMA Supplemental EA, the grant conditions of the Project Worksheet, and pursuant to 1) FEMA's Instruction 108-1-1 for environmental planning and historic preservation responsibilities, including Executive Orders (EOs) addressing floodplains (EO 11988), wetlands (EO 11990), and environmental justice (EO 12898); 2) the Department of Homeland Security's Instruction Manual 023-1-1 and 3) the Council of Environmental Quality's regulations in Title 40 Code of Federal Regulations, Chapter V for implementing NEPA; FEMA determined the proposed project will not significantly affect the quality of the natural and human environment. As a result of this FONSI, an EIS will not be prepared and the project, as described in the Project Worksheet, attached USFS EA, and the grant conditions listed in Attachment A, may proceed.

APPROVAL

MARK G EBERLEIN Digitally signed by MARK G EBERLEIN
Date: 2020.04.20 12:26:11 -07'00'

Mark G. Eberlein Date
Regional Environmental Officer
FEMA Region 10

EHP ENDORSEMENT

ANNA J DAGGETT Digitally signed by ANNA J DAGGETT
Date: 2020.04.21 08:40:04 -07'00'

Anna Daggett Date
Public Assistance Branch Chief
FEMA Region 10

ATTACHMENT A: MITIGATION AND CONSERVATION MEASURES

As a general condition of FEMA funding, the County shall apply for, secure, and comply with appropriate federal, state and local permits, and abide by all the attached environmental/historic preservation Mitigation and Conservation Measures listed below:

Construction and Staging

- Equipment staging and parking areas should be located outside the riparian zone in weed-free sites, unless no other alternative exists.
- Materials for road building will be stored in designated upland stockpile areas.
- Excess fill removed from the former roadway, when closed and rehabilitated, would be used as source material for new roadbed.
- Native materials (e.g. substrate, riparian vegetation, rock, woody debris) excavated on site, will be conserved and stockpiled for later use in channel reconstruction, filling of culverts, or other site rehabilitation, and will be kept separate from other stockpiled material which is not native to the site.
- If there are any excess and unsuitable materials removed from the hillslope and road cut, those materials will be deposited and stabilized only in pre-designated waste rock sites.

Soils/Water/Riparian/Aquatics (SWRA)

- As necessary to achieve project objectives, the proposed Federal action includes the authorization and issuance of any permits required under Section 404 of the Clean Water Act by the US Army Corp of Engineers, or the Environmental Protection Agency, cooperating agencies. The action alternatives also include authorization and issuance of Idaho Department of Water Resources Stream Alteration permit in compliance with the Idaho Stream Channel Protection Act.
- Design the road surface drainage system to intercept, collect, and remove water from the road surface and surrounding slopes in a manner that minimizes concentrated flows in ditches, culverts and over fill slopes and road surfaces. Use a distance interval between drainage features that is suitable for the road material, gradient, and expected traffic levels.
- Where drainage culverts are needed, ensure that the concentrated flows will not cause hillslope erosion or gullies downslope toward the floodplain and stream channel. Provide a sufficient buffer distance at the outfall of road drainage structures for water to infiltrate before it is able to reach the waterbody.
- Locate stream crossings where the channel is narrow, straight and uniform, and has relatively flat terrain, to the extent practicable. Where lateral channel instability exists, design the road crossing large enough to account for natural channel adjustments and possible channel shifts over the design life of the structure.
- Design and install crossings to sustain bankfull dimensions of width, depth, and slope and maintain streambank resiliency and continuity through the structure.
- Align any culverts with the natural stream channel and orient the crossing perpendicular to the channel, to the extent practicable.
- Design the stream crossing structures to have sufficient capacity to convey peak annual flows and flood flows without appreciably altering streamflow and channel characteristics.
- Prior to culvert removal, cofferdams or other erosion structures shall be constructed to

isolate work areas from flowing water on fish-bearing streams. This should minimize sediment delivery and stream turbidity and prevent injury to aquatic organisms. Immediately prior to cofferdam construction and equipment entry into the stream, fish passage will be blocked with nets, then aquatic organisms in the project area will be netted and placed upstream of the work area to minimize direct injury.

- If pumps are needed, intake screens shall meet National Marine Fisheries Service (NMFS) screening criteria (NMFS 1996) i.e., they will have openings not exceeding 3/32-inch diameter with approach velocities of no more than 0.4 feet per second at the surface of the intake screen to avoid impingement.
- To accommodate floods, including associated bedload and debris, new culverts, replacement culverts, and other stream crossings shall be designed to accommodate a 100- year flood recurrence interval unless site-specific analysis using calculated risk tools or another method, determines a more appropriate recurrence interval.
- Fish passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams unless protection of pure-strain native fish enclaves from competition, genetic contamination, or predation by exotic fishes is determined to be an overriding management concern.
- Equipment refueling will occur outside of the riparian zone in an upland location as defined by a District Fisheries Biologist/Hydrologist. Refueling within the Riparian Conservation Area (RCA) will be allowed only in pullouts on the opposite side of the road away from the stream away from flowing water. Spill containment kits with absorbent pads (capable of absorbing petroleum products) will be kept on hand in case a spill occurs.
- Mechanical equipment should be inspected to ensure that it is free of leaks and clean of contaminants such as cleaning agents, motor oil and hydraulic fluids to prevent soil or water contamination. While the machinery is located in the water, it should be visually monitored to ensure no contaminant leaks develop. If leaks are noted, the machinery must be removed from the stream or wetland immediately to avoid potential water contamination.
- Trees or snags that are felled within RCAs would be left unless determined by the District Fisheries Biologist/Hydrologist to not to be necessary for achieving soil, water, riparian, and aquatic desired conditions (as per Forest Plan guidance.)
- To prevent streambank erosion and streambed disturbance, minimize the number of stream crossings by heavy equipment and minimize ground disturbance within the RCAs.
- Where there is potential for increased streambank erosion and sediment deposition into the active stream channel, use of erosion control materials (e.g. silt fencing, straw wattles, coir logs) will be required.
- In excavation areas adjacent to flowing or standing water (including streams, wetlands or side channels), sediment filtering devices (i.e. silt filter fence, wattles, weed free straw bales, etc.) shall be used to limit delivery of disturbed soils and fill material into the creeks. These will be placed between the work area and flowing water to intercept sediment that might be flushed/spread from the work site.
- To avoid release of contaminated soils into the stream, do not allow road surface or roadbed materials to enter the stream during maintenance and decommissioning actions.
- Excavation and other equipment used in the proposed action will not ford or travel in any wetted stream channel except as necessary to complete the proposed actions.
- Following disturbance of any riparian or streambank vegetation, native plantings and/or

seeding will be used to re-establish riparian vegetation and provide long-term bank stabilization. A Sawtooth National Forest botanist will be consulted to identify appropriate seed mixtures for use.

- When conducting near stream/instream work, turbidity will be monitored at the fully mixed zone. If turbidity levels exceed 50 NTUs over background levels work must cease immediately and measures to reduce turbidity must be taken before continuing to reintroduce streamflow or work within the stream channel.

Work Windows and Fish Avoidance

- No in-channel, sediment-producing activities will be conducted in/near Big Smoky Creek outside of appropriate work windows in order to prevent direct and indirect impacts to spawning and rearing ESA-listed bull trout and critical habitat. All work will be completed from October 15 to August 15. Outside of the work window, work in Big Smoky Creek may proceed only when spawning surveys have been conducted by a trained observer, just prior to the activity, and no staging fish or spawning activity/redds are observed in the vicinity of the project. Generally, 600 feet downstream and 300 feet upstream. Should migrating, spawning or redds of listed fish species be observed within or 600 feet downstream of the project area prior to implementation, then the USFWS will be contacted in order to determine how or if the activity can proceed.
- Restoration activities in riparian areas should occur during the late summer or fall when site conditions are driest, unless spawning habitat is adjacent to the project area.
- Handling of fish will be conducted by or under the direction of a fisheries biologist, using methods directed by the following; NMFS Guidelines for Electrofishing Waters Containing Salmonids Listed Under the Endangered Species Act (NMFS,2000); Idaho Department of Fish and Game Scientific Collection Permit.

Scenic Environment and Visual Resources

- Develop cut slopes from road development to mimic natural topographic patterns from the characteristic landscape (e.g. natural undulations common to the native slope should be incorporated into the finished grading for the road cut).
- Where slope cuts exceed 3:1, work with the Forest landscape architect to develop slope stabilization techniques including, but not limited to, dry-stack rockery or pinned soil matting to allow slopes to 'hold' and establish vegetation.
- Remove and stage topsoil and vegetative material from initial excavation to place back on disturbed slopes for growing medium and seed source.

Noxious Weeds and Invasive Plants

- Source material for the new alignment would come from the existing gravel pit on Fleck Summit and from road widening along FR 012 from the Big Smoky area over Fleck Summit to the private land to the north (see Figure 10). Prior to use, the source area(s) would be inspected for noxious weeds. If found, infestations would be avoided or treated, per currently approved Forest policies and practices, prior to use.
- Only approved treatments and herbicides will be used to treat noxious weeds. Treatments would comply with the "*Sawtooth Invasive Species Record of Decision, June 18, 2019.*"
- To prevent invasion/expansion of noxious weeds, earth-disturbing equipment shall be high

pressure washed to remove all visible plant parts, dirt, and material that may carry noxious weed seeds, and/or invasive life forms, prior to entry into the project area.

- As needed to prevent erosion and minimize the risk of invasion or expansion of noxious weeds, reseed or revegetate areas where the soil has been exposed by ground- disturbing activity using native plant materials or a Forest Service botanist-approved native seed mix.
- New and existing populations of noxious weeds within and adjacent to the project areas would be avoided or inventoried and treated under the District's noxious weed program prior to project implementation.
- Gravel or borrow material source sites will be identified prior to implementation. Sites shall be noxious weed free or if noxious weed species are present, an effective treatment and monitoring mitigation measures would be fulfilled.
- Staging areas, when required, will be located in previously disturbed areas that are noxious weed free. Rehabilitation will occur following completion where/as necessary.
- Materials such as hay, straw, or mulch that are used for rehabilitation and reclamation activities shall be free of noxious weed seeds.
- Ongoing inventory, monitoring and treatments would begin prior to FR 227 Realignment Project implementations and continue throughout the implementation period and for 5 years following project completions.

Recreation/Public Safety

- Notify public of road construction and possible hazards prior to implementation through official press release.
- Post warning and/or closure signs during road construction to inform the public of construction operations and truck traffic hazards.
- Notify affected outfitters and the general public of road closures that would occur during big game hunting seasons.

Heritage

- If cultural material is discovered during the course of the project, the work in the immediate vicinity will cease, and the Forest Archaeologist will be notified immediately.

Forest Road 227: Road Realignment Project (Bowns Washout)

Public Assistance DR 4333 PW 34

Final Supplemental Environmental Assessment, Camas County, Idaho

April 2020

FEMA

U.S. Department of Homeland Security Federal Emergency Management Agency Region X
130 228th Street SW
Bothell, WA 98021

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SECTION ONE | INTRODUCTION

1.1 OVERVIEW

The US Forest Service (USFS) has prepared an *Environmental Assessment (EA) Forest Road 227 Road Realignment (Bowns Washout) Project* (USFS 2020). The Federal Emergency Management Agency (FEMA), through its Public Assistance grant program implemented under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, is providing financial assistance to Camas County under a major Disaster Declaration (4333 DR-ID) signed by the President on August 27, 2017. This Supplemental Environmental Assessment (SEA) was prepared in accordance with a Unified Federal Review as outlined in The Sandy Recovery Improvement Act (SRIA), Section 1106: Unified Federal Review. Section 1106 mandates the establishment of an "…expedited and unified interagency review process to ensure compliance with environmental and historic requirements under Federal law relating to disaster recovery projects, in order to expedite the recovery process, consistent with applicable law.

This SEA is intended to provide supplemental discussions and/or decision-making documentation for resources/areas of concern that are required to be evaluated in all FEMA Environmental Assessments. These resources include Executive Orders 11988 (Floodplains), 11990 (Wetlands), 12898 (Environmental Justice), the Endangered Species Act (ESA) and the National Historic Preservation Act (NHPA).

To provide the reader with sufficient detail, pertinent portions of the USFS EA are summarized or cited in this Supplemental Environmental Assessment (SEA).

1.2 BACKGROUND

Forest Road (FR) 227 is the main east-west vehicle access route through the Fairfield and Ketchum Ranger Districts of the Sawtooth National Forest (see Figure 1). From Featherville, Idaho on the west side, to Ketchum, Idaho on the east, this road is seasonally important for Forest users, emergency personnel, and land managers. The road is not plowed in the winter and is closed annually to all motorized vehicles (snowmobiles) from Big Smoky to the Forest boundary near Featherville from December 1 to April 30. FR 227 within Camas County is maintained by Camas County Road and Bridge through an easement granted by the US Forest Service in 1998.

Runoff events in the spring of 2017, as a result of record snow pack, caused several sections of FR 227 to completely or partially wash out, blocking vehicle access. Just west of Bowns Campground (west of Big Smoky Guard Station) on the Fairfield Ranger District, Big Smoky Creek completely washed out the road for an approximate ½ mile stretch (Figure 2). This washout, in addition to pre-existing washouts downstream from 2014 and 2015, blocked vehicular access between Featherville and Big Smoky.

In 2017, Camas County applied for FEMA funds to complete the proposed road relocations around the Bowns washouts. This project is co-sponsored by the US Forest Service, Camas County, and FEMA.

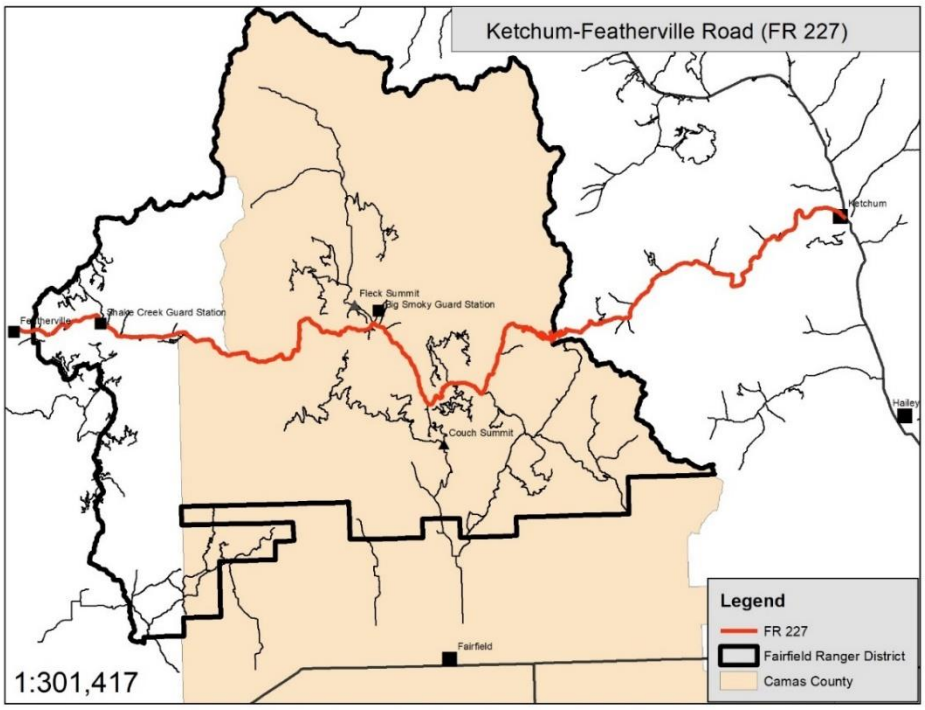


Figure 1-Forest Road 227

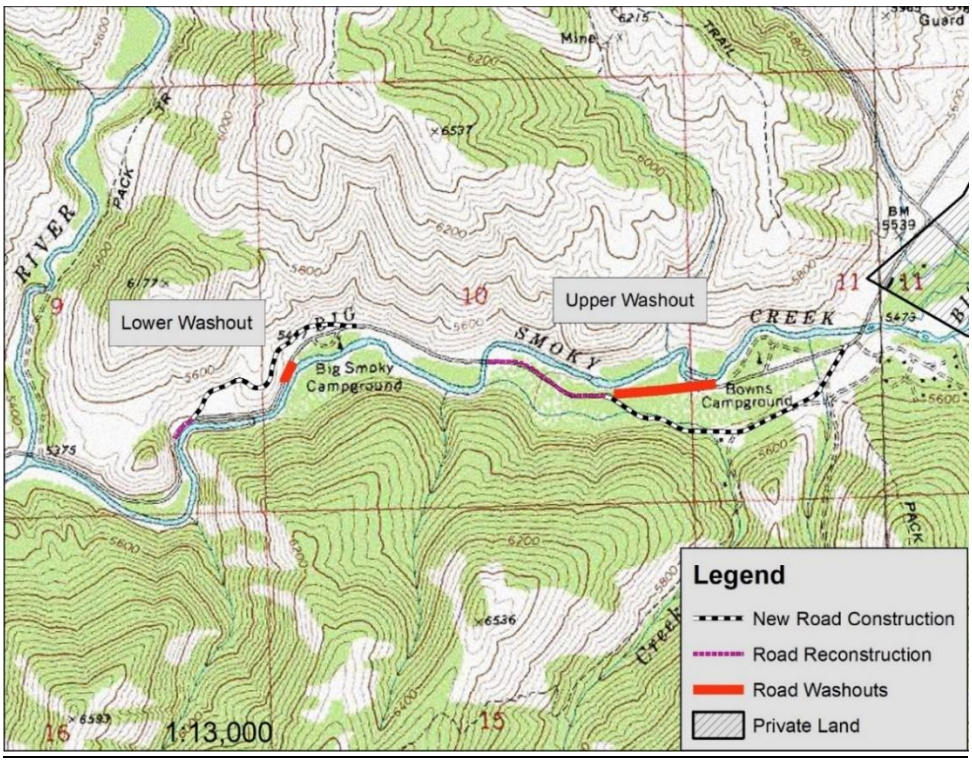


Figure 2-Location of FR 227 washouts west of Bowns Campground

SECTION TWO | PURPOSE AND NEED

2.1 STATEMENT OF PURPOSE

The purpose of the FEMA Public Assistance Grant Program is to provide funds to assist communities responding to and recovering from major disasters or emergencies declared by the President. The purpose and need for the project is the same as in the USFS Environmental Assessment (USFS EA 2020), which is to restore vehicular access and transportation connectivity across the Fairfield Ranger District for Forest users, emergency personnel and land managers in a sustainable location, and maintain or improve aquatic habitats and recreation opportunities

2.2 DESCRIPTION OF PROPOSED ACTION

The proposed action is the same as described in the USFS EA (2020), including all mitigation measures and design features (USFS EA 2020, Appendix 1). The Proposed Action will realign approximately 6,000' of road around the washout areas and is described in Alternative 3 below.

SECTION THREE | ALTERNATIVES

3.1 INTRODUCTION

The USFS EA 2020 analyzed three alternatives (including a No-Action option) and considered but dismissed three other options to meet the purpose and need. This SEA will only address the alternatives considered

3.2 ALTERNATIVES CONSIDERED

3.2.1 Alternative 1: No Action

No action would be taken, and the road would remain flood damaged and unusable.

3.2.2 Alternative 2: Rebuild FR 227 in Place

This alternative would rebuild FR 227 in its previous locations. Since instream work would be required, construction would occur during low flows. At the eastern (upper) washout near Bowns Campground, reconstructing the road would require moving Big Smoky Creek back to the north and off the previous roadway. A new channel would be excavated through the cobble bar on the north side of the existing channel (formed during the 2017 run off event) such that reconstruction of the road would occur in dry conditions. Large rock and road base material would be built up on the previous road location for approximately ¼ mile to an elevation above flood level (at least 1.5' above previous road surface height).

The western (lower) washout would be repaired in a similar manner but would not require

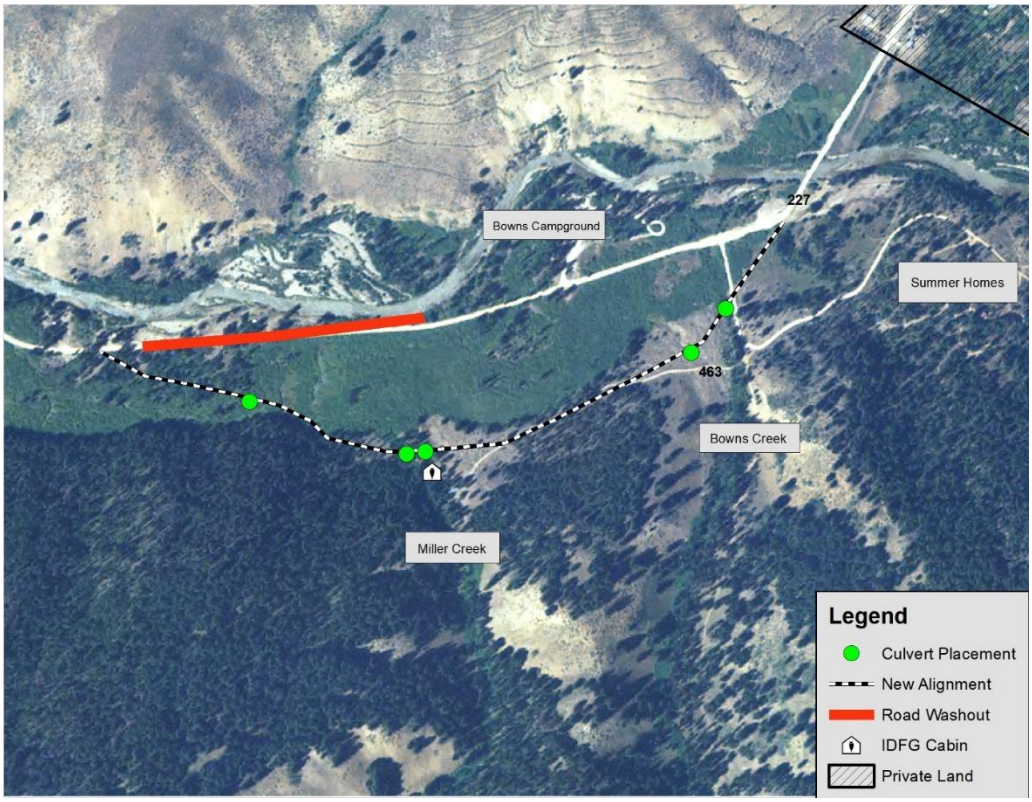
excavating a new channel or moving the existing stream.

3.2.3 Alternative 3: Realign FR 227 (Preferred Alternative)

This Alternative (Figure 3) includes the realignment around the eastern-"upper" washout from the bridge over Big Smoky Creek just west of the private land at Big Smoky (Smoky Bar). Forest Road 227 would be realigned to the south west, cross Bowns Creek with a new 60" squash pipe culvert, and intersect with the existing Forest Road 463 that accesses the Idaho Fish and Game (IDFG) cabin and the Miller Creek trailhead (Figure 2 and 3). A new road would be constructed crossing Miller Creek with a new 60" squash pipe culvert just north of the IDFG cabin, and then cross approximately 150' of wetland (Miller Creek flooded by beaver dams). An approximately 20' wide open bottomed box culvert would be utilized in the wetland. The road would reconnect to the existing FR 227 west of the Bowns washout. Road elevations would be 2.5' higher than existing ground level through the lodgepole pine on the north side of the Miller Creek wetland. This realigned segment of FR 227 would be approximately 3500' in length. Willows and mud removed from the wetland along the new roadway would be utilized in bioengineering a protective berm where the new road reconnects with the existing FR 227.

Access to the Big Smoky Summer Homes, Salt and Miller Creek Trailheads, Bowns Campground, and dispersed campsites (such as previous "Big Smoky Campground") would be maintained. Damaged sections of FR 227 between the two washouts would be repaired in place and built up 1.5' above previous road surface height and widened approximately 2' on either side, to a total width of 24' (see Road Reconstruction in Figure 2).

Figure 3 -Proposed Realignment around the eastern upper washout

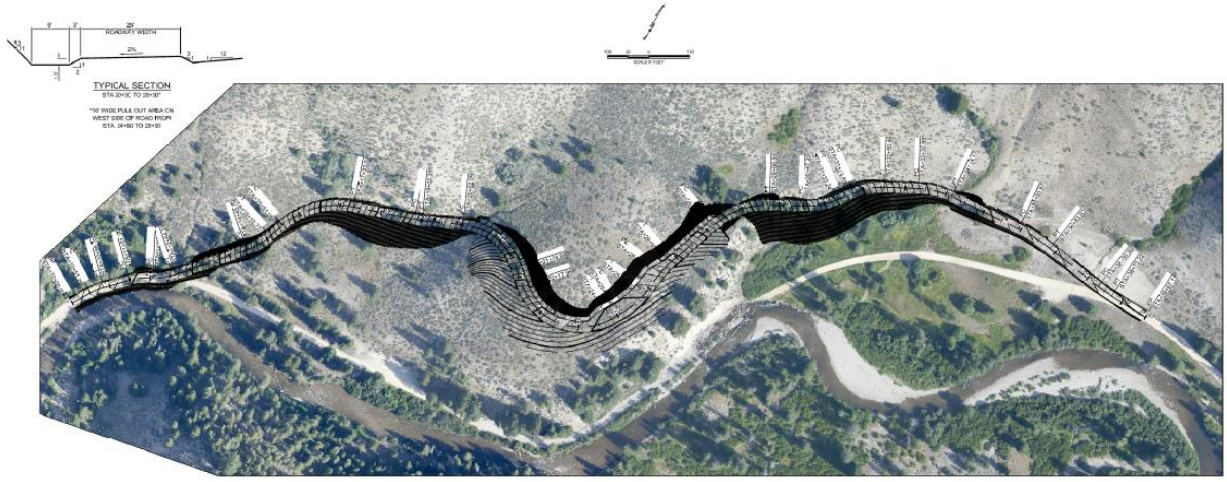


Large woody debris (logs and rootwads) would be placed in the current side-channel of Big Smoky Creek (where the FR 227 was previously located) in order to help retain sediment and build up the stream bottom through this stretch. Rootwads would be placed at the upstream end of this stretch to act as a "plug," allowing some flow into the side channel but maintaining most of the flow in the main channel.

Realignment around the western–"lower" washout

From the site of the previous "Big Smoky Campground," FR 227 would be realigned to the north over an existing hill for approximately 2,500' in order to completely remove the road from the floodplain at this location (see Figure 4). Past streambank erosion at this bend in Big Smoky Creek was problematic for road maintenance due to the direct nature the stream hit the bank during spring run-off. Extremely large boulders (vehicle-sized) were placed at this location in the past and washed out by high flows (pers comm. Ted Strickler, Camas County Road and Bridge foreman).

Figure 4- Realignment of FR 227 at the lower (western/downstream) washout



Approximately 2,200 feet of existing FR 227 within the floodplain of Big Smoky Creek would no longer be needed as a result of these realignments. The unneeded road segments would be obliterated and naturalized (see Figure 5). Roadbed fills would be removed to expose the original underlying soil and native topography. As the former soil is being exposed and conditioned, vegetation from the face of the former fills, and adjacent plugs, would be transplanted into the rehabilitated area. Organic matter and forest debris from adjacent sources or salvaged from new construction would be applied in order to enhance moisture retention, encumber continued use, and provide for the long-term productivity of the restored areas. Native seed and/or plantings may also be applied on segments where it is determined necessary to accelerate revegetation.

3.2.4 Actions Common to All Alternatives

Under all the alternatives: The existing Fleck Summit Road (FR 012) does not meet proper road standards, poses a safety concern, and is planned to be widened by the USFS under any of the

alternatives. The action will widen Fleck Summit Road (FR 012) from Big Smoky over Fleck Summit to connection with FR 079 (approximately three miles). Along FR 012 the uphill side of the road would be excavated between 5' to 15' into the hillslope to accommodate the widened road and borrow ditch to improve the safety of the narrow and steep section (Figure 6).

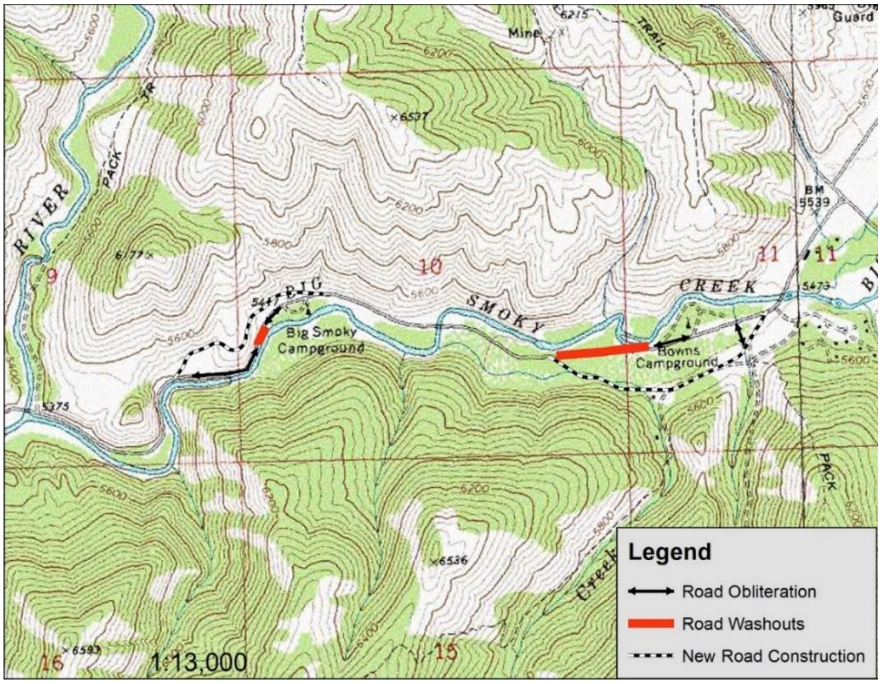


Figure 5-FR 227 Road segments to be removed

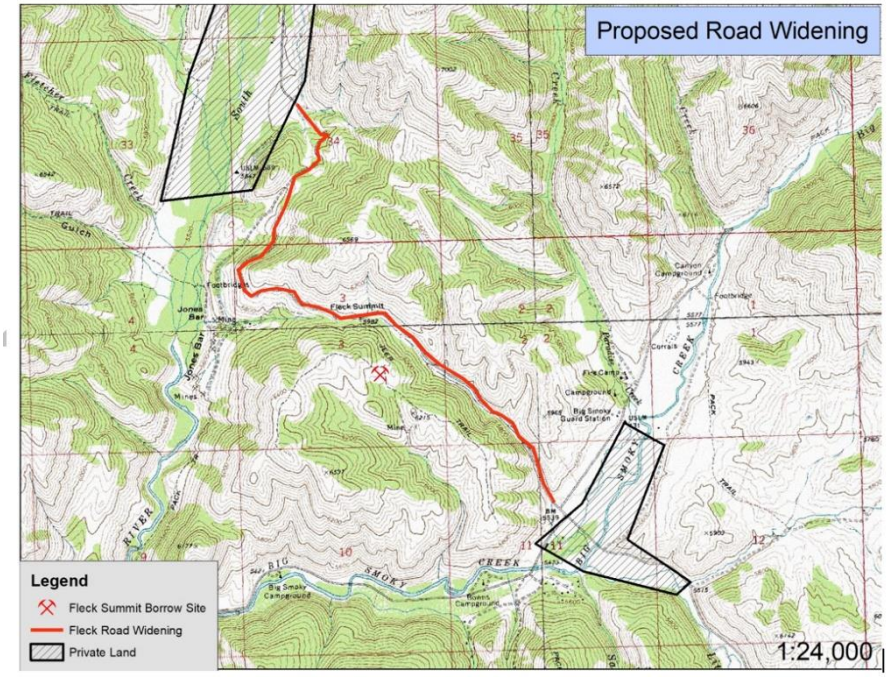


Figure 6-FR 012 Road widening and Fleck Summit Gravel Pit

SECTION FOUR | AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The USFS has analyzed the consequences of the considered alternatives (USFS 2020). This supplemental Environmental Assessment will provide additional discussions and/or provide further documentation and analysis focusing on 11988 (Floodplains), 11990 (Wetlands), Environmental Justice, ESA and the NHPA.

***Mitigation Measures*:** No additional mitigation measures or Best Management Practices (BMPs) are recommended for the resources below. The proposed action includes BMPs and other mitigation measures and are identified in Appendix 1 of the USFS EA (2020).

4.1 Executive Orders 11988 & 11990 Floodplains & Wetlands

Executive Order 11988, Floodplain Management, requires federal agencies to reduce the risk of flood loss; minimize the impact on human health, safety, and welfare; and restore the natural and beneficial values served by floodplains. Under FEMA's implementing regulations at 44 CFR Part 9, FEMA must evaluate the potential effects of any actions it may take in a floodplain and consider alternatives to avoid adverse effects. FEMA regulations define a floodplain as "the lowland and relatively flat areas adjoining inland and coastal waters including, at a minimum, that area subject to a 1% or greater chance of flooding in any given year" (44 CFR 9.4). Based on topographic vegetative, and hydrologic conditions, unmapped floodplain occurs along lowland areas adjacent Big Smokey Creek and associated project tributaries.

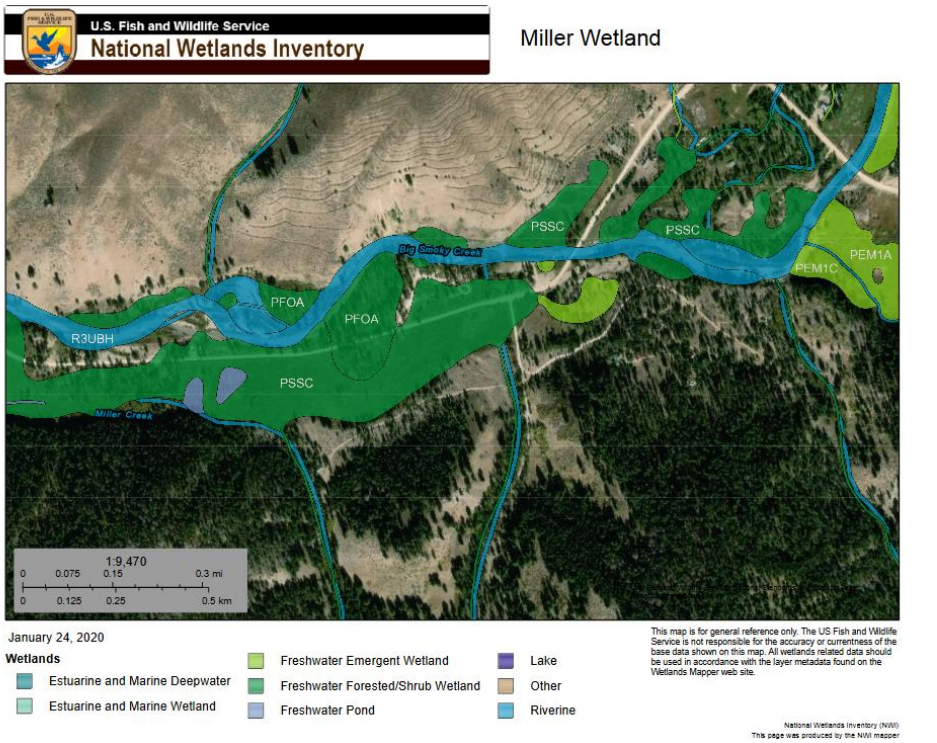
Executive Order 11990 directs federal agencies to avoid, to the extent possible, long and short-term adverse impacts associated with the destruction or modification of wetlands. Wetlands are subject to regulation under Sections 404 and 401 of the Clean Water Act (CWA).

The National Wetland Inventory (NWI) mapping identifies that the existing damaged FS 227 road bisects palustrine scrub-shrub and forested wetland. Based on preliminary wetland delineation efforts completed by the USFS, the wetland is approximately 30 acres in size and approximately 2-3 feet deep. The wetland is perched on hardpan and hydrologically supported by Miller Creek and surface runoff. The size of the wetland has been influenced by water impoundment by beaver dams and the existing flood damaged FS 227 road to the north of the wetland area (Figure 7).

A portion of the proposed work will occur in the floodplain, and there are also wetlands in the action area. Activities would provide long-term benefits to aquatic resources. Any negative effects would be localized, temporary or short-term and will be mitigated with project design criteria. The project will maintain water quality to support Beneficial Uses, consistent with the State of Idaho Department of Environmental Quality 303d standards. All necessary permits and authorizations will be obtained prior to implementation, including Joint Application Section 404 Permits from the State of Idaho and Army Corps of Engineers, as well as coverage under the Stream Channel Protection Act MOU with the Idaho Department of Water Resources. The project, as designed, will comply with the Clean Water Act.

A detailed analysis of the 8-step review process required by 44 CFR Part 98/11990 can be found in Appendix A.

Figure 7-NWI Map of project area



4.1.1 Direct/Indirect Effects of Alternative 1 (No Action) to Floodplains and Wetlands

Under the no-action alternative, in the short-term (3-15 years), existing damaged sections of road would continue to degrade causing localized sedimentation and water quality effects to Big Smokey Creek and associated floodplain and wetland habitat. In the long-term (post-15 years), after abandoned sections of road are fully eroded, existing isolated floodplain area would be reconnected to the historical floodplain of the rivers and tributaries, restoring natural hydrology and likely creating additional wetland habitat. Wetland and riparian habitat would recover and likely redevelop along eroded streambanks. Water quality improvement, including decreased sediment/turbidity and decreased mid-summer water temperatures would likely occur.

Widening of FR 012 (Fleck Summit Road), as is proposed under all the alternatives, would have minor effects on unmapped floodplains and the wetland associated with the small channel along the existing roadway. However, widening would only occur on the uphill side of this road and efforts to minimize sediment delivery to the small stream would be taken.

4.1.2 Direct/Indirect Effects of Alternative 2 (Rebuild in Place) on Wetlands & Floodplains

Under Alternative 2, FR 227 would be rebuilt in-place. This alternative would be the least desirable of the three alternatives due to impacts to aquatic habitat including wetland and floodplains. There would be localized, short-term sedimentation effects to wetland and floodplain from construction

activity ground disturbance that would increase sedimentation and turbidity to aquatic habitats. Direct long-term impacts would occur to wetlands and floodplain from new road base fill in Big Smokey Creek. The new road sections would occupy and isolate historic floodplain and wetland areas to the south of the alignment, restrict channel migration, and diminish wetland and riparian habitat development.

Overall, this alternative would require rebuilding 1,262' of new road into what is now part of Big Smoky Creek. This would fill approximately 0.69 acres of floodplain/wetland for the east most (Upper) Bowns washout. The lower-west washout would require building approximately 250' of road in the channel that would fill approximately 0.14 acres of floodplain riparian streamside zone. The total distance of road required to build in place would be 1,512' resulting in 0.83 acres of floodplain/wetland impacts. All fill would result in loss for flood storage and potentially alter the streams natural flow characteristics resulting in erosion, sedimentation and loss of additional road from future flooding within the floodplain.

Executive Order 11988 and 11990 require federal agencies to avoid, reduce, and/or minimize impacts to wetland and floodplain unless there is no practical alternative to avoid the floodplain. The U.S Forest Plan states that roads in RCAs that are degrading riparian-dependent resources should be evaluated for obliteration or relocation where practical alternatives exist (FRGU05). Practical alternatives to avoid or minimize harm exist for both washouts (Alternative 3, Proposed Action). Therefore, building the road back in place would not meet requirements of the Forest Plan directive. FEMA's regulations require alternative sites or actions that avoid or minimize harm shall be taken if practicable. A practicable alternative was identified (Alternative 3) and therefore, must be taken.

4.1.3 Direct/Indirect Effects of Alternative 3 (Proposed Action) on Wetlands & Floodplains

Under Alternative 3, FR 227 would be reconnected by relocating the road around the two washouts (Figure 2). The proposed activities include the relocation of FR 227 to the southern edge of the Big Smoky floodplain at the upper washout, rehabilitation /removal of the damaged road sections that bisect floodplain, and the replacement of the existing ford on Bowns Creek to a crossing via a new culvert. Two new culvert crossings would also be installed on Miller Creek.

In the short-term (< 3 months), potential degradation of wetland and floodplain habitat could result from construction activities as a result of the transmission of sediment from runoff and toxic substances (heavy metals, gasoline, oil, grease, etc.) into streams from fuel spills or leaky equipment. However, due to design features, as listed in Appendix 1 of the USFS EA (2020), the potential for this to occur would be greatly minimized. With implementation of design features and the relocation of the road, such contaminants should have little potential to enter project area aquatic habitats at greater concentrations or in a more impacting manner than previously occurred with use of the road through the center of the floodplain/wetland. A moderate amount of near stream/instream work is proposed under this alternative, which in the temporary term (< 3 months), would have localized, short-term negative effects, however, negligible effects to watershed conditions.

Alternative 3 would require building approximately 277' of new 24-foot wide road within the Miller Creek floodplain/wetland complex associated with the "eastern upper washout". This

equates to approximately 0.15 acres (29,600 square feet) of new floodplain/wetland impact. The new road section would be constructed crossing Miller Creek with a new squash 60-foot pipe culvert, then cross approximately 150' of wetland. A 20-foot-wide open bottomed box culvert would be utilized in the wetland. Willows and mud removed from the wetland along the new roadway would be utilized in bioengineering a protective berm where the new road reconnects with the existing FR 227. The new road section and culverts will likely affect wetland and floodplain hydrology in the wetland system. Roads can impound water, isolate areas of wetland and floodplain, and culverts can restrict flows and reduce or block aquatic organism passage. Per the project design features and BMPs (USFS 2020, Appendix A), however, to accommodate floods and associated debris flows, new culverts in streams shall be designed to accommodate a 100-year flood recurrence interval unless site-specific analysis using calculated risk tools or another method, determines a more appropriate recurrence interval. In addition, aquatic organism passage shall be provided at all proposed and reconstructed stream crossings of existing and potential fish-bearing streams. Dewatering, work area installation, and other erosion and sediment control measures shall also be implemented per the project BMPs.

Potential indirect effects from the proposed actions within the Big Smoky Creek drainage include the mobilization of sediment during the decommissioning of FR 227, road construction activities, and installation of the culverts on Bowns Creek and Miller Creeks. Some fine sediment would likely become mobilized during these activities, and therefore may reach Big Smoky Creek and SF Boise River. The amount of sediment is anticipated to be negligible due to design features. These changes are anticipated to cause minor, short-term direct effects to aquatic species or their habitat.

4.2 Executive Order 12898 Environmental Justice

The E.O. directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law.

According to the 2010 US Census, Camas County has a population of 1,127 people (Jul 1, 2018) of which 6.5% identified as Hispanic or Latino, 3.5% identified as Two or More Races, 0.4% identified as Asian, 1.4% identified as American Indian or Alaska Native, 0.5% identified as Black or African American, and 88.1% identified as White. 49.4% of the County is Female, while 22.4% of the County is 65 years or older. The median household income (in 2017 dollars) from 2013-2017 was $36,667. Persons in poverty was recorded at 9.7%.

4.2.1 Direct/Indirect Effects of Alternative 1, 2, and 3

No impacts were identified that would disproportionately adversely affect human health or the environment effects on minority and low-income populations for all three alternatives. The preferred alternative (Alt. 3) will equally benefit all demographic groups within or near project area.

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American Indian or Alaska Native, 0.5% identified as Black or African American, and 88.1% identified as White. 49.4% of the County is Female, while 22.4% of the County is 65 years or older. The median household income (in 2017 dollars) from 2013-2017 was $36,667. Persons in poverty was recorded at 9.7%.

4.2.1 Direct/Indirect Effects of Alternative 1, 2, and 3

No impacts were identified that would disproportionately adversely affect human health or the environment effects on minority and low-income populations for all three alternatives. The preferred alternative (Alt. 3) will equally benefit all demographic groups within or near project area.

4.3 Endangered Species (ESA)

The ESA of 1973 (16 United States Code [U.S.C.] 1531 et seq.), as amended, established a national program for conserving threatened and endangered species of fish, wildlife, plants, and the habitat on which they depend. Section 7 of the ESA requires federal agencies to consult with NMFS and the USFWS, as appropriate, regarding species protected under the ESA.

Federally listed species and critical habitat that might occur in the project vicinity include the bull trout (T), Canadian Lynx (T), Northern American Wolverine (PT) and bull trout critical habitat. Due to the existence of downstream man-made fish blockages, there are no species or critical habitat under the National Marine Fisheries Service (NMFS) within the project vicinity. Based on the project location and lack of suitable habitat in the project area, North American Wolverine (PT) are not anticipated to occur or have the potential to be affected by any of the action alternatives. Bull trout and bull trout critical habitat occur in the project area and have the potential to be affected by proposed actions under the action alternatives. In addition, the FR227 Realignment Project alternatives occur within the Beaver-Boardman-Miller Lynx Analysis Unit (LAU) and may affect the Canada Lynx.

The USFS has initiated informal ESA Section 7 consultation in a requested dated February 13, 2020 with the USFWS for bull trout, bull trout critical habitat and the Canada Lynx. The USFWS concurred the Forest's determination for these species and critical habitat in a letter and analysis dated April 1, 2020 (USFS Project Record). Additionally, the Forest determined that the project would have no effect to North American wolverine. FEMA concurs the USFS determinations.

4.3.1 Bull Trout and Bull Trout Critical Habitat

Direct/Indirect Effects of Alternative 1 (No Action), Alternative 2, and Alternative 3 for bull trout are adequately described in the USFS EA (2020) along with mitigation measures in Appendix 1 (USFS 2020).

4.3.2 Canada Lynx

The Canada Lynx is typically associated with spruce, subalpine fir, and lodgepole pine forests in the mountains of the west (Koehler 1989). They are well adapted to cold winters and deep snows of northern latitudes, typically above 4,000 feet elevation (Koehler et al. 1979). Unlike other carnivores whose diet may be quite varied, lynx prey almost exclusively on snowshoe hares (*Lepus americanus*) (Koehler 1989). Forest conditions that favor snowshoe hare abundance benefit lynx.

Koehler (1989) found the highest snowshoe hare densities in 10-20 year old stands of lodgepole pine, which is where lynx concentrate their hunting efforts. Although lynx are specialized for hunting hares, alternate food sources including tree squirrels, voles, mice and grouse are also important.

The Lynx Conservation Assessment and Strategy (LCAS) was developed to provide a consistent and effective approach to conserve Canada lynx and to assist with Endangered Species Act (ESA) consultation. The LCAS was last revised in August 2013 to include updates from research and the 2005 USFWS recovery outline. The recovery outline stratified lynx habitat into 3 categories: core, secondary, and peripheral areas. Core areas are places where long-term persistence of lynx and recent evidence of reproduction have been documented. Secondary/peripheral areas might contribute to lynx persistence by supporting successful dispersal or exploratory movements, however, these areas are not likely to support home ranges and reproduction. The Sawtooth NF is now considered secondary habitat for lynx, with core habitat for lynx occurring in areas outside the state of Idaho. Conservation measures in secondary/peripheral focus on providing a mosaic of forest structure to support snowshoe hare prey resources for individual lynx that infrequently may move through or reside temporarily in the area and maintaining landscape connectivity to allow for lynx movement and dispersal.

The FR227 Realignment Project occurs within the Beaver-Boardman-Miller Lynx Analysis Unit (LAU). Predicted lynx habitat is mapped in the project area, however, due to the presence of existing roads, summer cabins, private land with structures, and campgrounds, the likelihood of lynx using this habitat is low. Except during the wintertime when recreation pressure in this area is reduced, there would not be much of a potential of a lynx using this habitat.

The nearest observation of a lynx to the project area was a confirmed specimen at the head of the North Fork of Lime Creek in 1916, approximately 11 air-miles to the southwest (Idaho CDC, 2002). No recent observation of a lynx has been made on the Fairfield Ranger District.

4.3.2.1 Direct/Indirect Effects of Alternative 1 (No Action)

Under the No Action alternative, current conditions would remain, however, the existing damaged roadway sections would continue to degrade and erode over time. Once the damaged road beds are fully eroded, natural hydrologic conditions of Big Smoky Creek, associated tributaries aquatic, riparian and previously unvegetated upland habitats would recover.

Widening of FR 012 (Fleck Summit Road), as is proposed under any of the alternatives, would have minor effects to upland habitats upslope of the road, but not have a measurable effect on the lynx or its habitat.

While generally considered a negative to recreation, one potential benefit of not reconnecting FR 227 would be the creation of an unroaded area along Big Smoky Creek, which might improve localized lynx habitat primarily related to reduced human disturbance.

No Action Alternative would not address the purpose and need of action; however, it would potentially improve habitat for the Canada Lynx by the creation of a roadless area along Big Smoky Creek.

4.3.2.2 Direct/Indirect Effects of Alternative 2 (Rebuild in Place)

Alternative 2 would require rebuilding 1,262' of new road and would have direct impacts on existing aquatic and riparian habitats reclaimed by natural process after the sections of road washed out. The project area and associated habitats, however, would largely return to pre-flood damage conditions. In the short-term, human visual and noise disturbance during construction and project development has the potential to displace the lynx in the project area if they were to occur. However, individual(s) would likely move to adjacent suitable habitat with negligible effects. Post-project, it is not anticipated that there would be a lower probability of lynx using the project area than currently exists.

Widening of FR 012 (Fleck Summit Road), as is proposed under any of the alternatives, would have minor effects to riparian and upland habitats, but would not have a measurable effect on the lynx or its habitat.

4.3.2.3 Direct/Indirect Effects of Alternative 3 (Proposed Action)

Under Alternative 3, the proposed road realignments would increase the total length of road by 3,000 feet over previous length and affect up to 3 acres of mapped predicted lynx habitat (eastern-"upper" road section). This is due to moving the road up and out of areas of floodplain. However, due to the presence of existing roads, private land developments and recreational campgrounds, the likelihood of lynx using this habitat is low. If the lynx did occur in the project area during construction, human and equipment related visual and noise disturbance, in the short-term, could displace individual(s), however, any affected individuals would likely migrate to adjacent suitable habitat and not be measurably affected by the actions.

At the landscape scale, the relatively minor increase in the distance of the new road associated with the project is not anticipated to affect the overall road use density as it relates to lynx habitat. In addition, the proposed road realignment would not influence any change in connectivity between LAU's. Overall, the 3 acres of noted habitat loss is considered inconsequential, due to low probability of lynx using the area and the habitat impacted, which is considered lower quality habitat (due to existing human disturbance). Furthermore, proposed road decommissioning associated with the project would likely result in restoring up to 2 acres of lynx foraging habitat (5-15 years post project).

Widening of FR 012 (Fleck Summit Road), as is proposed under any of the alternatives, would have minor effects to riparian and upland habitats, but would not have a measurable effect on the lynx or its habitat.

4.4 Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of undertakings that are federally funded or approved or take place on federally administered lands if those undertakings have the potential to affect any district, site, building, structure, or object that is listed, or eligible for listing, in the NRHP. Under Section 106, the lead federal agency must provide the State Historic Preservation Officer (SHPO), affected tribes, and other stakeholders with an opportunity to comment. Section 106 of the NHPA and its implementing regulations (36 CFR 800) outline the procedures to be followed in the documentation, evaluation,

and mitigation of impacts to cultural resources.

The project area occurs in what has been called the Snake River Region interface between major physiographic regions of the Plains and the Intermountain region (Butler 1986). As such, the region is subject to shifting cultural affiliations over time. Primarily inhabitants of this region were the Northern Shoshone, and later the Bannock Peoples. These people were highly mobile hunters and gatherers who practiced seasonal rounds following big game herds and gathering plant materials as they became available. Through time, subsistence strategies shifted to smaller game and intensive plant processing (Plew 2008).

The Sawtooth Forest Reserve was established in 1905 and renamed in 1907 the Sawtooth National Forest; it encompasses much of the Wood River Valley and surrounding area. The Sawtooth National Recreation Area was later established in 1972 (d'Easum 2002). A roadway through the project area was proposed as early as January 21st, 1914 by then Forest Supervisor C.N. Woods. Construction on the road did not begin until the summer of 1930 with a cooperative agreement between the Forest Service and the local mines. Over the next 25 years many improvements were made including bridges and culverts to replace low water crossings. Since the time of initial construction FS Road 227 has been continuously maintained and improved, flooding out many times and repaired and rerouted in many places as a result.

Cultural resource surveys for alternatives 2 and 3 of the FR 227 Realignment Project were conducted on October 18th, 2018 and September 10, 2019 by a Secretary Of Interior (SOI) qualified USFS archeologists (USFS 2019). A Cultural Survey Report and determination of significance and effect was completed by the USFS. The report also provides a detailed overview of the area's environmental and cultural setting. As a result of a phase I and III cultural resource inventories for this project, a records search revealed 22 historic properties within one mile of the project area of Alternatives 2 and 3. Four of these historic properties are located within the project's APE. All four of these resources were previously determined, with Idaho State Historic Preservation Office SHPO concurrence, to be not eligible for inclusion on the NRHP. Three sites were newly identified during survey and recommended not eligible for inclusion on the NRHP. A determination of "No Adverse Effects to Historic Properties" was recommended for the project involving the previously and newly identified historic properties. The SHPO concurred on February 20, 2020 (USFS Project Record). The USFS consulted with the Shoshone-Bannock Tribes, Shoshone Paiute Tribe, and Nez Perce Tribe of Idaho. Both the Shoshone-Bannock and Shoshone Paiute Tribes were supportive of the project. No comment was received from the Nez Peirce Tribe of Idaho subsequent to request for comments or during the EA public comment period (USFS Project Record).

4.4.1 Direct/Indirect Effects of Alternative 1 (No Action)

This alternative would leave the current situation as is, where Forest Road 227 is left unrepaired and remains washed out and unpassable. Alternative 1 will have no effects on historic properties because there would be no federal undertaking.

4.4.2 Direct/Indirect Effects of Alternative 2 (Rebuild in Place)

This alternative would rebuild FR 227 in its previous locations. Because this alternative would simply restore the road to its pre-disaster alignment and design, no impacts to cultural resources

would be anticipated. In accordance with Section 106, however, the proposed design would be evaluated to determine if consultation would be required.

4.4.3 Direct/Indirect Effects of Alternative 3 (Proposed Action)

The USFS survey identified no pre-historic cultural resources. However, three newly recorded historic cultural resources were identified during survey. These include isolate F-3092-001, a mining prospect pit determined not eligible for inclusion on the NRHP. Archaeological site SW-2690 is a mining operations water conveyance ditch. This mining ditch is 541-feet long and was dug into the base of the hillside west and south of Miller Creek. The site was also determined not eligible for inclusion on the NRHP. Isolate F-3092-001 and site SW-2690 are associated with the mining that took place within the region between the 1880's and the 1940's. The third cultural resource is the Ketchum-Featherville Road/FS Road 227. In conjunction with this project it was given the site number SW-2688. The road is recommended as potentially eligible for the NRHP; however, due to lack of any integrity, the segment of road within the APE was determined a non-contributing feature to the road as a whole. The proposed action was determined to have no adverse effects to historic properties as the potential NRHP eligibility of Ketchum-Featherville Road/FS Road 227 will not be changed by this project. Because there are no eligible historic properties in or near the project's APE, and the segment of Ketchum-Featherville Road/ FS Road 227 within the project area is non-contributing, no avoidance, minimization, or mitigation options are recommended.

4.5 Public Involvement

Initial public meetings and request for comment occurred in 2018 and 2019 (see USFS EA 2020). A formal 30-day notice and comment period occurred from January 31 – March 2, 2020. A letter announcing the 30-day 'Notice of Proposed Action' (NOPA) comment period along with instructions on where to find the EA and FEMA's Supplemental EA (SEA) were sent to all parties that had previously commented on this project. The EA and SEA was posted on the Sawtooth National Forest public website.

Two comment letters were received during the 30-day NOPA comment period. One letter was from the Idaho Department of Fish and Game (IDFG) concerning proximity of the realigned road, access to, and visibility of their special use permit cabin. The USFS Fairfield Ranger District conveyed to the IDFG via email on March 9, 2020 (USFS Project Record) that they are committed to working with the IDFG regarding these issues. The second letter was from the Idaho Conservation League primarily concerning Total Soil Resource Commitment in relation to the Fleck Summit Road widening component of the project. In addition, the letter had suggestions regarding the Fleck Summit gravel pit. Many of the suggestions regarding the existing gravel pit have already been addressed and were discussed on the phone on March 2, 2020. Total Soil Resource Commitment for the project meets Forest Plan standards and guidelines as demonstrated in the Forest Plan Consistency Checklist available from the USFS Project Record.

SECTION FIVE | REFERENCES

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APPENDIX A

EXECUTIVE ORDER 11988 – FLOODPLAIN MANAGEMENT EIGHT-STEP DECISION MAKING PROCESS

Executive Order 11988 (Floodplain Management) requires federal agencies "to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of the floodplain and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative." The Federal Emergency Management Agency's (FEMA's) implementing regulations are at 44 CFR Part 9, which includes an eight-step decision making process for compliance with this part.

The process includes a preliminary evaluation of whether a proposed action has the potential to affect floodplains or their occupants or is subject to potential harm by location in floodplains. The eight-step process applies to the proposed Forest Road 227 Road Realignment Project. Portions of the existing road as well as the proposed realignment occur in unmapped floodplain of Big Smokey Creek, it's tributaries and associated wetland,

Step 1: Determine if the Proposed action is located in the 100-year floodplain, which includes the coastal high hazard area (500-year floodplain for critical actions).

The United States Forest Service (USFS) Forest Road 227 has experienced multiple floods in the last decade, most recently in 2017 when an approximately ½ mile stretch of road washed-out due to high waters in Big Smokey Creek, just west of the Bowns Campground. This event came after flood-induced washouts of the road downstream in 2014 & 2015. The USFS proposes to realign the road around the washouts and further away from the creek.

In the project area, a Special Flood Hazard Area (100-year floodplain) has not been mapped/determined by the National Flood Insurance Program. The damaged road section parallels Big Smokey Creek, and based upon its location, observed road flood damages, NWI data and topographic information, this portion and the proposed roadway realignment is assumed to occur within the base floodplain (100-year floodplain).

Step 2: Provide Early Public Notice (Preliminary Notice).

This project was initiated by the USFS in January 2018. Public scoping for the project occurred from January 16 to February 15, 2018. Public comments were received, with comments encouraging the road to be reconnected as close to its original location as possible. A public meeting about repairing vs. relocating the road was held in Fairfield, Idaho on February 1, 2018 with an attendance of approximately 70. A second public meeting was held on August 13, 2019. The Fairfield Ranger District received a petition with 62 signatures requesting the road be replaced at its original location. The proposed action (and preferred alternative) of realigning the road around the washout areas within a reasonably close proximity to the original location received public support.

Meetings between the USFS and the Shoshone Paiute Tribes (Wings and Roots) were held on December 19, 2018 and September 11,2019. A meeting with the Shoshone Bannock Tribes was held on January 11, 2018. The Tribes were in support of the relocations/road reconnection and will be provided all NEPA documents (USFS Environmental Assessment Forest Road 227 Road Realignment (Bowns Washout) Project "*Proposal Development, Public Involvement, and Tribal*

Consultation" page 7). The USFS sent letters to the Nez Perce Tribe of Idaho on January 16, 2018 and on August 29, 2019 regarding the project. No response was received.

FEMA also gave public notice of its intent to reimburse eligible applicants for eligible costs to repair and/or replace facilities damaged by flooding, landslides, and mudslides related to this declared disaster (4333 DR-ID) on September 6, 2017. The notice may be reviewed at *https://www.fema.gov/disaster/4333/notices/public-notice*. This notice also cited Executive Orders 11988 and 11990.

Step 3: Identify and Evaluate practicable alternatives to locating in the floodplain (including alternative sites, actions, and the "no action" option). If a practicable alternative exists outside the floodplain, FEMA must locate the action at the alternative site.

The USFS Environmental Assessment identifies three alternatives, including no-action, to meet the purpose and need of the project.

The first action alternative to the proposed realignment includes rebuilding the road in-place (Alternative 2 in the EA). This action would meet the purpose and need by reconnecting the transportation corridor. It would also meet social needs (the public's support of reconnecting the road in its original location or close proximity (Step 2)). However, it does not reduce the risk of flood loss; minimize the impact of floods on human health, safety, or welfare; nor restore or preserve floodplain values. Repairing the existing damaged road in-situ is not the most practicable alternative.

The No-Action alternative does not meet the purpose and need as there would be no reconnection of the transportation corridor. By not meeting the purpose and need, the No-Action alternative is not the most practicable alternative.

The proposed realignment (Alternative 3) is the most practicable alternative that meets the purpose and need of the project as it reconnects the transportation corridor. The proposed realignment would move washed-out sections of the road further away from the creek, and while no mapping of the floodplain is available, moving the road away from the creek while presumably gaining elevation is a viable way of reducing impacts to and from the floodplain.

The proposed realignment may also improve the functionality of the floodplain. Removing the road further away from the creek will allow a larger capacity of water to be held by the floodplain in high-water events as there will no longer be a road prism and berm constricting the floodway and acting as a barrier to the floodplain. This gain in capacity may also reduce the amount of damage the realigned road might receive as a result of flood events, minimizing harm within the floodplain.

The proposed realignment is the most practicable as it meets the project's purpose and need, meets social need (public support for road reconnection in original location or close-proximity), reduces the risk of flood loss, and increases floodplain functionality (gain in capacity/reduce floodway constriction).

Step 4: Identify the potential direct or indirect impacts associated with the occupancy or modification of floodplains and the potential to direct and indirect support of floodplain development that could result from the proposed action.

There are several potential direct and indirect impacts associated with the proposed realignment.

Ground disturbance in previously undisturbed soils due to construction activities for the realignment of the road within the floodplain would occur. The addition of fill in the re-aligned road prism will have a direct effect by filling approximately 150' of wetland and associated unmapped floodplain. This loss of wetlands will likely negatively effect the habitat diversity and stability of wetland flora and fauna, including the Columbia Spotted Frog.

Other impacts include (per the USFS EA) short term disturbance of riparian areas that may indirectly impact water quality. Short term effects on water may include increased turbidity and in-stream sediment deposition in streams that are designated as critical habitat for Bull Trout. Streambank stability is likely to further be disturbed.

Impacts to public health, safety, and welfare (including water supply) are likely to be minimal as the area is used primarily for recreation. Other public interest uses of the wetland and floodplain such as recreational, scientific, and cultural are likely to be beneficially impacted as the public will continue to have access to wetland area and floodplain (the purpose and need addressing connectivity of the road and access to and through the National Forest).

The proposed alternative may beneficially impact the floodplain as the functionality (capacity to hold water during floods) associated with Big Smokey Creek is likely to increase as the road prism being moved away from the creek will allow the floodway to be less constricted. Not only will the floodway be less constricted, but the floodplain in between the proposed realignment and the current location of the road will be re-established as a natural functioning floodplain. The road re-alignment will also allow for the rehabilitation of wetlands in the area where the current road resides.

The realignment of the road should have no bearing on future development or use of the floodplains and wetlands as the US Forest Service manages the development and use of the area under their land use plans and regulations. The proposed alternative does not alter any development/use plans or opportunities. The realignment will reconnect transportation through the National Forest but does not exceed the previous condition of road transportation.

Step 5: Minimize the potential adverse impacts and support to or within floodplains to be identified under step 4, restore and preserve the natural and beneficial values served by the floodplains and wetlands.

The impacts discussed in Step 4 can be minimized and mitigated through the USFS's Best Management Practices addressed in the Environmental Assessment (see Appendix 1). Impacts will also be minimized by the adherence to Section 404 of the Clean Water Act which regulates the discharge of dredged or fill material into Waters of the United States, including wetlands. Activities such as discharge of fill into wetlands for construction is regulated through a permit process reviewed by the US Army Corps of Engineers (USACE). The USFS will be required to adhere to the Section 404 permit review through the USACE.

While the project will have impacts in the floodplain and to wetlands, the road realignment provides an opportunity for a beneficial outcome and allows for restoration of the floodplain itself.

The eastern portion of the realignment (also designated "upper" in the USFS EA) would be 1.5' higher than the existing ground level (and current washout location), while the western "lower" realignment would be located on a hill that gains elevation, effectively removing the entirety of the "lower" portion of road from the floodplain.

The USFS estimates that 2,200 feet of the existing FR 227 would be removed from the approximate floodplain.

Vegetation is proposed to be removed from the effected wetland and used as a bioengineered protective measure to protect this new alignment where it meets the existing road. The old road beds in both the eastern/upper and western/lower portions are proposed to have the old fill removed and the soils rehabilitated with the transplant of vegetation from the face of former fills and adjacent plugs. Organic matter and forest detritus salvaged from the new construction areas will be applied to the old road beds. Additionally, if revegetation is determined to be accelerated, native seed and/or plantings may be applied to the rehabilitated area.

The Forest Service estimates that while approximately 0.15 acres of wetland will be impacted directly by the fill for road realignment.

Step 6: Reevaluate the proposed action to determine first, if it is still practicable in light of it's exposure to flood hazards, the extent in which it will aggravate the hazards to others, and it's potential to disrupt floodplain values and second, if alternatives preliminarily rejected at Step 3 are practicable in light of the information gained in Steps 4 and 5. FEMA shall not act in floodplain unless it is the only practicable location.

The proposed project aims to realign an existing road that suffers from washouts and erosion. The realignment, while proposing to build some portion of the new road within the floodplain and over existing wetlands, will move most of the road to higher ground within the floodplain (eastern/upper) and entirely remove a segment of road from the floodplain (western/lower). This action will ultimately maintain the function and better protect the road while preserving and enhancing the functionality of the floodplain where the old washout road will be removed.

Entirely re-routing the road out of the floodplain is untenable due to steep and easily erodible slopes. The No-Action alternative will entirely lose the function of the road and would not meet the purpose and need. This hinders connectivity, land management access, recreational access, and lessens the value of the Sawtooth National Forest for use by people. The preferred alternative moves the road to a portion of the floodplain with less effects to or from floodplain functions or out of the floodplain where slopes are less steep or erodible, which makes it a practicable alternate action.

Step 7: Prepare and Provide the public with a finding and public explanation of any final decision that the floodplain is the only practicable alternative.

The Final EA/SEA, and decision document (Finding of No Significant Impact [FONSI] or Notice of Intent [NOI]) will provide the public with the agency's final decision regarding the project.

Step 8: Review the implementation and post-implementation phases of the proposed action to ensure that the requirements stated in Section 9.11 are fully implemented. Oversight responsibility shall be integrated into existing processes.

The proposed action would be constructed in accordance with applicable floodplain regulations. Oversight responsibility would be built into the implementation and post-implementation processes.