November 13, 2018

Submitted Via Email: ttce@usbr.gov

Title Transfer
CE Coordinator, U.S. Bureau of Reclamation
Mail Stop 84–53000
Denver Federal Center
Denver, Colorado 80523

RE: Comments on Proposal to Create Categorical Exclusion for Title Transfer
(Proposed Amendments to Departmental Manual – 516 DM 14)

To Whom it may Concern:

The A&B Irrigation District ("A&B" or "District") submits the following comments on the U.S. Bureau of Reclamation’s proposed revision to the Departmental Manual ("DM") to establish "a new Categorical Exclusion ("CE") for the transfer of title of certain projects and facilities from Reclamation to a qualifying non-Federal project entity" (the "CE Notice").

Further, A&B joins in and supports the comments submitted by the Idaho Water Users Association.

By way of background the Minidoka Project North Side Pumping Division (A&B Project) was initiated in the mid-twentieth century in Jerome and Minidoka Counties in southern Idaho. Landowners, including returning veterans, scratched out thousands of acres of productive farmland out of the arid Idaho desert. The project has a rich and unique history in the area and helps support Idaho’s thriving agricultural economy. The project consists of over 180 deep wells, two pumping plants on the Snake River, and numerous canals, laterals, and pipelines that deliver water to approximately 82,000 acres. Reclamation turned over operation and maintenance responsibilities to the District in 1966. The District is set to fully repay its contract obligations in 2020.

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1 83 FR 52503 (Oct. 17, 2018)
Although the District has successfully operated the project for decades under Reclamation’s oversight, the District believes title transfer would benefit its landowners as well provide opportunities to assist the State of Idaho in the conservation and enhancement of its water resources. Local control and delivery of water resources is a key policy goal that both the State and the federal government have adhered to for over a century. Further, title transfer would benefit the local Reclamation office and its staff. Instead of spending valuable time and resources on District issues, Reclamation would be free to focus on its mission and operations concerning the facilities it actually operates (i.e. Upper Snake River reservoir system). As such, the District is keenly interested in pursuing formal title transfer.

To that end, A&B is encouraged by Reclamation’s proposed rule change and the possibility of qualifying for a categorical exclusion. The District has experience with the NEPA process, including spending several months and over $200,000 in completing a recent environmental assessment associated with the development of a second river pumping station. Changing title where there project will continue to operate as it has for over 50 years does not require or need such a complicated review process. Accordingly, the District is fully supportive of Reclamation’s proposed change and believes it will save Reclamation and taxpayers millions when viewed at the possibilities throughout the entire western United States.

The District appreciates the opportunity to submit these comments and urges Reclamation to adopt the rule as final. If you have any questions or need additional information please contact our manager Dan Temple at (208) 436-3152.

Sincerely,

[Signature]

Hector Parkin
Vice-Chairman, Board of Directors

cc: Senator James Risch
    Senator Mike Crapo
    Congressman Raul Labrador
    Congressman Mike Simpson
    Governor C.L. “Butch” Otter
    Brenda Burman, Commissioner (USBR)
    Lorri Gray, Regional Director (USBR – PN Region)
    Paul Arrington, IWUA