Chapter 5

Environmental Commitments

5.1 Best Management Practices

Reclamation has developed draft BMPs (Appendix B) in coordination with NMFS and USFWS. These BMPs are included as environmental commitments that Reclamation will implement for projects covered under this EA. Pending internal discussions at NMFS, modifications may be made to these BMPs at a later date for consistency with other NMFS projects. The BMPs are specific provisions for Reclamation projects in the Lemhi, Upper Salmon, Little Salmon, and Middle Fork Clearwater Subbasins in Idaho. Items that are addressed by the BMPs include erosion and sedimentation, turbidity, pollution control, isolation of work areas, staging areas, fish handling and transfer, construction practices, restoration, and other natural and physical resource concerns. Other environmental commitments are listed below. Although not listed here, the management actions identified in the Proposed Action are also considered to be environmental commitments.

5.1.1 Biological Resources

1. Rare and sensitive species clearances described below will be conducted after project authorization, but prior to the start of construction.

2. If native plant communities must be used for access roads or staging areas, site clearances at the appropriate time of year for the species involved will be conducted by qualified biologists to ensure sensitive species are not impacted. Any established search protocols will be followed. Additional information concerning avoidance of threatened or endangered species is presented in Section 3.7.

3. Construction activities that could impact fish will be undertaken during non-spawning periods.

4. During the project implementation period, species not currently protected under the Endangered Species Act may be listed. If any such species occur on Reclamation lands, Reclamation would enforce time of year access restrictions in areas harboring Federal and State designated species of special concern (including Federally designated rare, endangered, or threatened species). Other measures described in Chapter 3 and in the BMPs (Appendix B) will be implemented by Reclamation.

5.1.2 Site Restoration and Revegetation

1. Construction areas, including storage yards, will limit the amount of waste material and trash accumulations at all times.

2. All unused materials and trash will be removed from construction and storage sites during the final phase of work. All removed material will be placed in approved sanitary landfills or storage sites, and work areas will be left to conform to the natural landscape.

3. Upon completion of construction, grade any land disturbed outside the limits of reservoir pools, permanent roads, and other permanent facilities to provide proper drainage and blend with the natural contour of the land. Following grading, revegetate using plants native to the area, suitable for the site conditions, and beneficial to wildlife.

4. Where applicable, consult with the following agencies to determine the recommended plant species composition, seeding rates, and planting dates:

    - Idaho Department of Fish and Game
    - U.S. Natural Resources Conservation Service (NRCS)
    - U.S. Bureau of Land Management (BLM)

5. Grasses, forbs, shrubs, and trees appropriate for site conditions and surrounding vegetation will be included on a plant list developed during site design. Species chosen for a site will be matched for site drainage, climate, shading, resistance to erosion, soil type, slope, aspect, and vegetation management goals. Wetland and riparian species will be used in revegetating disturbed wetlands. Upland revegetation shall match the plant list to the site's soil type, topographic position, elevation, and surrounding communities. Other specific items can be found in the BMPs in Appendix B.

5.1.3 Pollution Prevention

1. All Federal and State laws related to control and abatement of water pollution will be complied with. All waste material and sewage from construction activities or project-related features will be disposed of according to Federal and State pollution control regulations.

2. Construction contractors may be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit as established under Public Law 92B500 and amended by the Clean Water Act (Public Law 95B217).

3. Construction specifications shall require construction methods that will prevent entrance or accidental spillage of pollutants into flowing or dry watercourses and underground water sources. Potential pollutants and wastes include refuse, garbage, cement, concrete, sewage effluent, industrial waste, oil and other petroleum products, aggregate processing tailings, mineral salts, drilling mud, and thermal pollution.

4. Eroded materials shall be prevented from entering streams or watercourses during dewatering activities associated with structure foundations or earthwork operations adjacent to, or encroaching on, streams or watercourses.

5. Any construction wastewater discharged into surface waters will be essentially free of settling material. Water pumped from behind cofferdams and wastewater from aggregate processing,

concrete batching, or other construction operations shall not enter streams or watercourses without water quality treatment. Turbidity control methods may include settling ponds, gravel-filter entrapment dikes, approved flocculating processes not harmful to fish or other aquatic life, recirculation systems for washing aggregates, or other approved methods.

6. Appropriate controls to reduce stormwater pollutant loads in post-construction site runoff shall be followed.

5.1.4 Noise and Air Pollution Prevention

1. Contractors will be required to comply with all applicable Federal, State, and local laws and regulations concerning prevention and control of noise and air pollution. Contractors are expected to use reasonably available methods and devices to control, prevent, and reduce atmospheric emissions or discharges of atmospheric contaminants and noise.

2. Contractors will be required to reduce dust from construction operations and prevent it from damaging dwellings or causing a nuisance to people. Methods such as wetting exposed soil or roads where dust is generated by passing vehicles will be employed.

5.1.5 Cultural Resource Site Protection

1. Conduct any necessary cultural resource survey and clearance prior to any ground-disturbing activity related to project implementation. Develop appropriate mitigation if necessary.

2. If the Tribes identify culturally important resources within new development areas, avoid adverse impacts to those resource locations when avoidance will allow accomplishment of broader agency responsibilities, is cost effective, and lies within Reclamation's authority.

5.2 Mitigation Measures

Because of the extensive BMPs developed in coordination with the agencies and the resource protection measures built into the Proposed Action, no specific mitigation measures are necessary. However, if cultural resources are identified prior to construction the following mitigation measure would apply.

5.2.1 Cultural Resources

Mitigation under all alternatives would occur if cultural resources are present that are eligible for the National Register, and if they are being adversely impacted by reservoir operations or land uses or are being damaged by natural agents. If an action is planned that could adversely impact historic properties, Reclamation would investigate options to avoid the site. Cultural resource management actions for impacted sites would be planned and implemented in accordance with consultation requirements defined in 36 CFR 800, using methods consistent with the Secretary of the Interior's Standards and Guidelines.