



DRAFT FINDING OF NO SIGNIFICANT IMPACT

CITY OF LEWISTON WATER SYSTEM IMPROVEMENTS PROJECT

NEZ PERCE COUNTY, IDAHO

Lower Granite Lock and Dam

Clearwater River

April 2025

The U.S. Army Corps of Engineers, Walla Walla District (USACE) has conducted an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended. The *April 2025 City of Lewiston Water System Improvements Environmental Assessment* (Attachment A), which is the NEPA document associated with this draft Finding of No Significant Impact (FONSI), considered and analyzed the potential environmental effects of assisting the City of Lewiston (City) with their proposed new drinking water intake system. The intended purpose of this action is to provide a reliable long-term drinking water solution for approximately one-half of the City's growing population.

The EA initially considered five alternatives to provide a reliable source of drinking water to the City. These included: Alternative 1 – No Action Alternative; Alternative 2 – Retrofit Permanent Intake Facility; Alternative 3 – Upgrade the Corrective Action Intake Facility; Alternative 4 – Construct a New Wet Well Shaft and Pump Station Using a Trenchless Drive to Install a New Water Pipeline (Preferred Alternative); and Alternative 5 – Construct a New Wet Well Shaft and Pump Station with an Above-Ground Low Head Siphon System. Each alternative was screened based on four criteria: technical feasibility, cost-effectiveness, environmental feasibility, and ability to provide a long-term solution. Based on this screening process, the EA advanced two alternatives for detailed evaluation: The No Action Alternative and Alternative 4, which was identified as the Preferred Alternative.

The Preferred Alternative would require the construction of a completely new wet well shaft and 30-foot by 30-foot pump house about 80-feet to the east of existing permanent pump station. The City would install the raw water pipeline approximately 130-feet into the Clearwater River to the preferred intake screen site using a micro-tunnel boring machine. The new intake screens would be installed in the nearby deep pools of the Clearwater River, protected by the in-river flow diversion structures. The new intake modifications would be designed for protection of salmonid fry according to the National Marine Fisheries Service (NMFS) criteria as set forth in their July 2011 publication for Anadromous Salmonid Fish Passage Facility Design. A 6-foot-deep trench would also be dug on the discharge side of the pump station to bury 30-inch yard piping up to 3.5-feet to connect to the existing yard piping.

The Preferred Alternative would also require USACE, Real Estate Division, to



issue a temporary construction license. This temporary construction license would be to probe and conduct test borings to determine optimal locations of the new facilities. The existing pump plant and appurtenances are covered under outgrant DACW68-2-80-20 which would be amended after the contractors submit final design plans.

USACE proposes to cost-share the construction of the in-water components of the City's Preferred Alternative under the authority of the Water Resource and Development Act (WRDA) of 1999. This act authorizes USACE to participate in environmental infrastructure projects in rural Nevada and Montana. Public Law 108-7 (February 20, 2003) amended this legislation to include the State of Idaho. USACE intends to utilize this authority to assist the City with its proposed drinking water infrastructure project. The total federal cost would not exceed \$703,000. Non-reimbursable costs (Project Partnership Agreement package preparation, process reimbursements, the USACE National Environmental Policy Act (NEPA) compliance, and project management) total \$30,000.

The No Action and Preferred Alternative were evaluated for potential effects to the following resources (Table 1):

Table 1. Resources Carried Forwards for Environmental Analysis

Resource Affected	In-depth evaluation conducted	Resource unaffected by action
Aesthetics/Visual Quality	-	X
Land Use	-	X
Noise	-	X
Recreation	-	X
Air Quality	-	X
Geologic Features, Soils, and Sediments	X	-
Water Quality	X	-
Aquatic Resources including Threatened and Endangered Aquatic Species	X	-
Terrestrial Environmental including Threatened and Endangered Terrestrial Species	X	-
Historic and Cultural Resources	X	-
Socioeconomics	X	-

USACE determined that the Preferred Alternative would have result in no impacts to the Aesthetics/visual Quality, Land Use, Noise, Recreation, and Air Quality. Therefore, these resources were not carried forwards for detailed analysis within the EA. Refer to Section 3 Table 3-1 for more details.

The remaining resources were carried forwards for analysis and USACE determined that the Preferred Alternative would result in the following impacts (Table 2).



Table 2. Summary of Impact of the Preferred Alternative

Resources	Insignificant effects	Insignificant effects as a result of mitigation*	Resource unaffected by action
Geologic Features and Soils	X	-	-
Water Quality	X	-	-
Aquatic Resources	X	-	-
Terrestrial Resources	X	-	-
Threatened and Endangered Species	X	-	-
Historic and Cultural Resources	X	-	-
Socioeconomics	X	-	-

The analysis conducted within the draft EA determined the Preferred Alternative would result in less than significant effects to the all the resources considered for environmental analysis.

Pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, as amended, USACE biologists drafted a Biological Assessment (BA), which considered the Preferred Alternative's activities and analyzed the potential impacts to ESA-listed species within the area of potential effect. Through this analysis, USACE determined that the Preferred Alternative could result in adverse impacts to ESA-listed species and that informal and formal consultation with the Services was required. The BA determined there would be "No Effect" to Spalding's Catchfly, however, due to the proposed in-water work, the action "May Affect, Is Likely to Adversely Affect" ESA-listed salmonids, more specifically Snake River populations of Chinook salmon, steelhead, and bull trout. Refer to the BA for a detailed effects analysis.

The USACE initiated informal consultation with the USFWS on November 22, 2024, and formal consultation with the NMFS on October 29, 2024. The USACE received a Letter of Concurrence from the USFWS on January 02, 2025. An updated Official Species List was generated on March 27, 2025, which included Monarch Butterfly (*Danaus plexippus*) and Suckley's Cuckoo Bumble Bee (*Bombus suckleyi*) in addition to Spalding's Catchfly (*Silene spaldingii*). USACE biologists determined re-initiation of consultation with the USFWS was un-necessary because the action would result in "No Effect" to these species or their critical habitat, as discussed in Section 3.4 & 4.1.2 of the EA. There is no designated or proposed critical habitat for these species within or near the action area.

The USACE received a Biological Opinion (BO) from the NMFS, dated April 15, 2025, which determined that the Preferred Alternative is not likely to jeopardize the continued existence of identified ESA-listed species or destroy or adversely modify their designated critical habitat, contingent upon the implementation of the requirements outlined within the "Reasonable and Prudent Measures" and the "Terms and Conditions" sections of the BO. All required biological conservation measures are outlined within Section 4.3.1 of the EA, and are also explicitly detailed within the USACE BA, USFWS



Letter of Concurrence, and NMFS Biological Opinion (Attachment B).

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, USACE archaeologists analyzed the Preferred Alternative's potential impacts to any historic properties within the APE and determined that the action would result in No Adverse Effects to historic properties. One historic property was identified adjacent to the APE, that being a portion of the Lewis and Clark National Trail System. USACE contacted the National Park Service on 22 April 2022 and received a concurrence response from them on 03 May 2022. USACE sent letters and their reported Section 106 findings to the Idaho State Historic Preservation Office and Nez Perce Tribe. Concurrence responses were received from the Idaho SHPO on 06 May 2022. No response was received from the Nez Perce Tribe. Cultural resources correspondence documentation is located within Attachment C.

The Clean Water Act (CWA) of 1972 establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. Section 404 of the Clean Water Act established a program to regulate the discharge of dredged or fill material into waters of the United States. Section 404 compliance would be met with using Nationwide Permit 58 – Utility Line Activities for Water and Other Substances. Section 401 of the Clean Water Act requires that any federal activity that may result in a discharge to waters of the United States must first receive a water quality certification from the state in which the activity will occur. The Idaho Department of Environmental Quality is the state certifying authority for Section 401 and has issued Water Quality Certification (WQC) for actions that meet Regional and General Conditions for NWP #58 provided that the action does not result in a discharge to a "outstanding resource water". USACE has determined that the Preferred Alternative would meet the requirements for WQC and would ensure that the permitted activities are carried out in compliance with the limitations and associated requirements of the 2021 NWPs, Regional Conditions, and conditions of this water quality certification (see Section 4.1.9 of the EA).

Section 402 of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) program, pertains to discharge of pollutants. No pollutants would be discharged into waters of the United States by activities associated with the Preferred Alternative; therefore, a NPDES permit would not be needed. Construction associated with the Preferred Alternative is expected to result in 0.8 acres of ground disturbance. If implementation of the Preferred Alternative would result in more than one acre of ground disturbance with potential for stormwater runoff into the Clearwater River, the contractor would be required to apply for a Construction General Permit by filling out an electronic Notice of Intent on the Environmental Protection Agency website, in compliance with Section 402 of the CWA. A stormwater pollution prevention plan would also need to be prepared by the contractor and submitted to the USACE for approval.

See Section 4 of the EA for a discussion of how the Preferred Alternative complies with other laws, regulations, and Executive Orders.



All applicable laws, regulations, Executive Orders, and local government plans were considered in evaluation of alternatives. Based on these reports, the reviews by other federal, state, and local agencies, Tribes, input of the public, and the review by my staff, it is my determination that implementation of the recommended plan would not cause significant effects to the quality of the human environment; therefore, preparation of an Environmental Impact Statement is not required. USACE would issue a construction license and provide cost-share assistance to the City to implement their Preferred Alternative when funds are made available for that purpose.

Date

KATHRYN A. WERBACK,
PE, PMP LIEUTENANT
COLONEL, Corps of Engineers
Walla Walla District Commander



Attachment A: Water Resource and Development Action Section 595 City of Lewiston Water System Improvements Project, Environmental Assessment, dated April 2025

Attachment B: City of Lewiston Section 595 Biological Appendix

Attachment C: City of Lewiston Section 595 Cultural Appendix

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