



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
201 NORTH THIRD AVENUE
WALLA WALLA, WA 99362-1876

August 28, 2017

SUBJECT: Jackson Hole Flood Protection Project Supplemental Environmental Assessment (EA)

Ms. Mary Hopkins
Wyoming State Historic Preservation Office
Barrett Building 3rd Floor
2301 Central Avenue
Cheyenne, Wyoming 82002

Dear Ms. Hopkins:

The U.S. Army Corps of Engineers, Walla Walla District (Corps) is preparing a supplemental EA to evaluate proposed changes to its current operation and maintenance (O&M) program for the Federal and non-Federal levees included in the Jackson Hole Flood Protection Project (JHFPP) (see enclosed map). This supplemental EA evaluates current and proposed O&M actions that may have been adequately addressed in the April 1990 Jackson Hole, Wyoming Flood Protection Project O&M Decision Document and Environmental Impact Statement, EIS) (1990 O&M Decision Documents/EIS).

The 1990 O&M Decision Document/EIS identified nine types of activities to be performed under the O&M program—all of which have been identified as current activities by the JHFPP Project Manager:

- a. Snow removal for the JHFPP is performed as early as possible to maintain dry levee surfaces in the event where a levee may need to be repaired or rehabilitated.
- b. Levee patrols are typically once a day when flows reach 10,000 cfs, but increased to twice a day when flows exceed 15,000 cfs. Furthermore, inspectors concentrate on critical areas (defined as locations where flow impingement could potentially cause damage).
- c. Emergency Response measures include repairing lost revetment, toe rock, and slope damage along the river side of levee. This requires the use of heavy equipment and stockpiled riprap. Other emergency efforts include, but limited to, repairing damage from seepage by piping action through the levee and repairing sand boils located along the land side of the levees during flood events.
- d. The JHFPP stockpiles a minimum of 25,000 tons of riprap material located in strategic locations for emergency maintenance. Riprap is purchased through a multi-year supply contract or as government-furnished property for more extensive repair work or levee rehabilitation.
- e. Levee Rehabilitation includes the processes needed to return levees to their original design profile. This includes the removal of vegetation, replacing deficient rock with better quality riprap material, and the installation of new fill material where the current levee profile

does not meet original design standards. Many of these areas were the location of emergency levee repair and activities.

f. Culverts are maintained annually. This includes the removal of excessive sediment buildup within the culvert itself, and the removal of woody debris placed by beavers in the vicinity of culverts. The cleaning of the culverts include high-pressure water jets. In some instances, however, a culvert must be dewatered for maintenance. In which case, a temporary cofferdam is installed and removed after maintenance is complete. Culvert cleaning and debris removal utilizes hands tools and heavy equipment when necessary.

g. The required vegetation removal involves removing all woody vegetation within the levee profile, as well as a 15-foot maintenance/inspection/access zone for both sides of the levee. There is an exception that allows woody vegetation on the land side when located within overbuilt areas, as long as the roots do not debilitate the effective prism. Current O&M practices use tracked excavators and backhoes to remove large woody debris including the rootballs and roots with ½ inch diameters. Fill material is used when large holes remain after tree removal. Smaller vegetation, typically less than six feet in height, is treated chemically with Wyoming certified applicators.

h. Maintenance of the wear surface (access roads) includes the work necessary to allow traffic (speeds between 15-25 mph) along the levee surfaces. This includes adding new crushed materials and grading when necessary.

i. Recent efforts aimed to control dust and air quality include the spraying of magnesium chloride to high-use gravel roads. This typically occurs during the dry season (July-September).

These activities are limited to the existing levee system, defined as the levee easements currently held by the Corps. Easement boundaries are typically 100 feet on the water side and 50 feet on the land side in reference to the levee centerline. Although non-federal levees have less clearly defined easement boundaries, O&M activities typically stay within these dimensions.

The Corps is proposing to add the five following activities to its routine O&M activities at the JHFPP:

a. Remove woody vegetation from the entire landward side of the levee prism and from a 15-foot clear zone extending outward from the landward toe of the levee. The 1990 O&M Decision Document/EIS discussed removing woody vegetation from the levee footprint, but did not specifically mention the clear zone. The Corps has not been removing vegetation from the landward clear zone. The vegetation removal may affect wetlands. If the 15-foot clear zone would extend past the levee easement boundary, the Corps would remove woody vegetation only between the levee toe and the easement boundary.

b. Repair, rehabilitate, or replace culverts through the levees. This includes headgates, headwalls, and wingwalls. The 1990 O&M Decision Document/EIS only addressed cleaning the culverts. This activity would take place well within the existing levee easement and should not extend beyond the levee prism.

c. Extend existing turnarounds adjacent to the levees or construct additional turnarounds. These are needed to accommodate the larger equipment being used currently. The turnaround extensions may extend beyond the levee easement boundary and if so, would require additional land under easement.

d. Construct additional in-water structures to protect some of the levees from damage such as erosion or undercutting by the river. These structures would likely be within the easement boundary.

e. Provide for developing additional rock and fill material stockpile areas, if needed. These stockpile areas may be located outside the easement boundary and if so, would require additional land under easement.

In order to make determinations of effect for the subject undertaking, the Corps continues to utilize the 1985 "No Effect" programmatic agreement between the Corps and Wyoming SHPO (enclosed). This agreement allows limited O&M activities without Wyoming SHPO consultation as long as:

a. In the course of yearly repair work, the Walla Walla District will both confine its undertakings to only those portions of the levee system which already exist and obtain needed materials for repairs from existing borrow areas. However, all scheduled work will be submitted to Wyoming SHPO in a yearly report.

b. If cultural resources are encountered during O&M activities, all work in the area will cease until proper evaluation from a certified archaeologist occurs.

c. If new sections of levee or new borrow areas are required, then subsequent National Historic Preservation Act Section 106 consultation is obligatory.

Of the five changes to O&M activities proposed above, the Corps has determined the first two are covered by the stipulations included in the "No Effect" letter. However, the last three (c, d, and e) clearly fall outside the stipulations of the "No Effect" letter. The Corps has determined that projects related to any of these three activities will require formal Section 106 review and consultation.

The Corps respectfully requests your comments and recommendations per 36 CFR 800, regulations implementing Section 106 of the NHPA. The Corps proposes to continue utilizing the 1985 "No Effect" letter for O&M activities located within the existing levee system. In the event an undertaking cannot be covered by the "No Effect" letter, the Corps will complete a Section 106 review in consultation with your office and interested tribes.

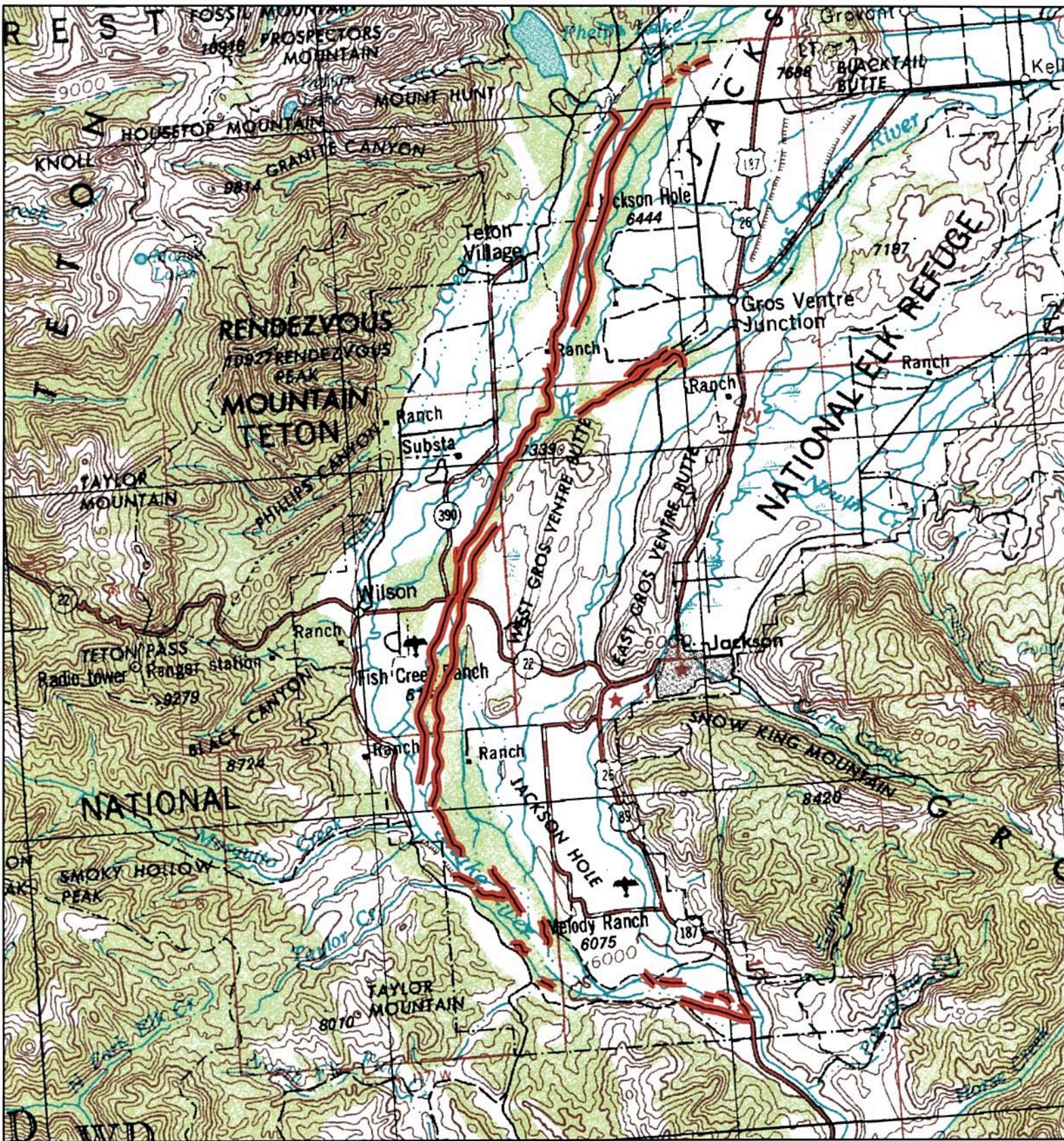
If you have any questions or comments, please contact Mr. Christopher D. Wernick at 509-527-7297, or Christopher.D.Wernick@usace.army.mil or myself at 509-527-7278, or Robin.B.Michel@usace.army.mil.

Sincerely,



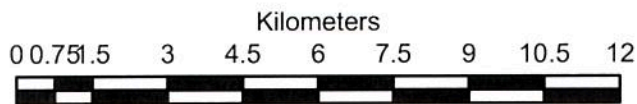
Robin B. Michel
Acting Supervisory Archaeologist

Enclosure



Legend

 JHFPP



Jackson Hole Flood Protection Project (JHFPP)
Jackson, Wyoming
USGS 250K Topo Map
Scale 1:150,000





DEPARTMENT OF THE ARMY
WALLA WALLA DISTRICT, CORPS OF ENGINEERS
BUILDING 602, CITY-COUNTY AIRPORT
WALLA WALLA, WASHINGTON 99362-9265
October 7, 1985

REPLY TO
ATTENTION OF:
Planning Division

OCT 11 1985

Mr. Tom Marceau, Director
Historic Preservation Division Review and Compliance
Archives, Museums, and Historical Department
2301 Central, Barrett Building
Cheyenne, Wyoming 82002

Dear Mr. Marceau:

Pursuant to applicable Federal law, the Walla Walla District, Corps of Engineers, maintains and repairs the Jackson Hole Levee System located in the State of Wyoming. Maintenance of this levee system is done on a yearly basis and involves repair work to designated sections of the levee using material from existing borrow areas. As the District will continue to maintain and upkeep this levee system as permitted by applicable Federal law, we are looking to establish with your office an agreement that adherence to the following stipulations will satisfactorily avoid any adverse impact to cultural resources and therefore result in a "No Effect" determination for all such work associated with the existing Jackson Hole Levee system.

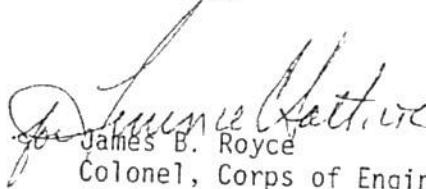
a. In the course of yearly repair work, the Walla Walla District will both confine its undertakings to only those portions of the levee system which already exist and obtain needed materials for repairs from existing borrow areas. For all such instances of planned maintenance work, the District does not need to seek a determination of "No Effect" from the Wyoming State Historic Preservation Office (SHPO). However, locations of all scheduled work will be submitted to the SHPO.

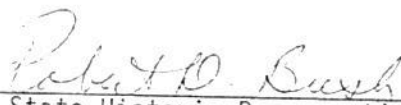
b. Should cultural resources be encountered in the course of maintenance work, all work in the project area will immediately stop until such time as proper evaluation and action can be taken with regard to the find(s).

c. In the event that new sections of the Jackson Hole Levee need to be constructed or new borrow areas have to be developed, the Walla Walla District will go through the normal procedures required for obtaining cultural resources clearance prior to the start of the proposed work.

If this procedure meets with your approval, please indicate in the space provided below by signing, dating, and returning one copy to us for our permanent files.

Sincerely,


James B. Royce
Colonel, Corps of Engineers
District Engineers


Wyoming State Historic Preservation Officer

October 21, 1985
Date



Ed Herschler
Governor

Wyoming State
Archives, Museums & Historical Department

Barrett Building

State Historic Preservation Office

Cheyenne, WY 82002

Robert D. Bush, Ph. D.

Director
307-777-7519

October 18, 1985

Mr. John P. Leier, Archeologist
Walla Walla District, Corps of Engineers
Building 602, City-County Airport
Walla Walla, Washington 99362-9265

RE: §"No Effect" Determination for Regularly Scheduled Levee Maintenance

Dear Mr. Leier:

The Wyoming SHPO has signed and returned a copy of the blanket "No Effect" determination as drafted by your office. In order to cover all bases, a copy of this agreement should be forwarded to the ACHP for their review as the Council may wish to become a party to the document as well.

Sincerely,

Thomas E. Marceau

Thomas E. Marceau
Preservation Programs Supervisor

TEM:klm
Encls.



September 15, 2017

Robin B. Michel, Acting Supervisory Archaeologist
Department of the Army
U.S. Army Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876

re: Jackson Hole Flood Protection Project Supplemental Environmental Assessment (SHPO File # 1289RLB055)

Dear Ms. Michel:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the above referenced undertaking.

We concur that the U.S. Army Corps of Engineers (Corps) utilize the 1985 "No Effect" for O&M activities for the first two of the of the five proposed changes (a and b), and consult formally on under Section 106 of the final three (c through e).

Please refer to the SHPO project control number 1289RLB055 on any future correspondence dealing with this project. If you have any questions, contact me at 307-777-5497.

Sincerely,

Sincerely,

A handwritten signature in blue ink, appearing to read 'Richard L. Currit'.

Richard L. Currit
Senior Archaeologist

Wyoming State Historic Preservation Office
Barrett Building, Third Floor | 2301 Central Avenue | Cheyenne, WY 82002 | 307-777-7697



Matthew H. Mead, Governor
Darin J. Westby, P.E., Director



DEPARTMENT OF THE ARMY
WALLA WALLA DISTRICT, CORPS OF ENGINEERS
BUILDING 602, CITY-COUNTY AIRPORT
WALLA WALLA, WASHINGTON 99362-9265
October 7, 1985

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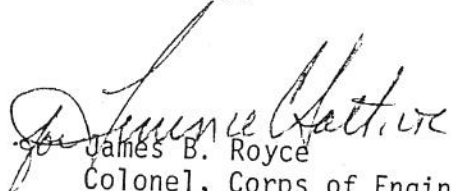
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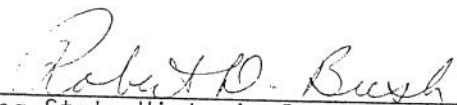
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