

APPENDIX G

IMPLEMENTATION OF BEST MANAGEMENT PRACTICES UNDER THE STREAM MAINTENANCE PROGRAM

Introduction

The District will process all routine stream maintenance activities according to the process and protocols established in Chapter 3 of the Stream Maintenance Program (SMP). The Resource Protection Protocol contained therein includes a step in the annual review process to identify appropriate Best Management Practices (BMPs) for the design and implementation of an activity. (See SMP Figure 3-1.) BMPs are methods that protect environmental quality or reduce environmental impacts from stream maintenance activities. In order to be effective, BMPs must be properly selected and implemented, applied consistently, and their effectiveness evaluated onsite to assure that they are meeting the required objective. The District's Geographic Information System (GIS) will be developed and enhanced to facilitate the stream maintenance project environmental review, processing, and implementation process, particularly for determining potential presence of sensitive species.

Not every BMP is designed to be used in every situation. Since BMPs are meant to be specific to particular activities and resources, the selection and implementation of an appropriate set of BMPs for each project is a key element to their effectiveness. Because of variation in District facilities and the tendency of individual site conditions to change over time, conditions under which each BMP must be applied cannot be strictly prescribed. The staff involved in design and implementation of the maintenance activity must retain some flexibility to determine which BMPs should be implemented according to design objectives and site conditions.

Selection, implementation, monitoring, and improvement of BMPs are all part of the program. Following is a brief discussion of how each of these activities will be applied under the Stream Maintenance Program to assure that resource protection goals are met.

Selection of Best Management Practices

The District will use the most current BMPs when planning or designing routine stream maintenance activities. Work within the Stream Maintenance Program can be divided into two general categories. Regularly scheduled work (most vegetation management, trash pick-up, etc.) is work that occurs in the same place and the same manner with a predictable frequency. Other routine work is not undertaken on a regular annual schedule, but is done as the need arises. This work (sediment removal, bank protection) has a less predictable frequency and location. This work is identified through field surveys, prioritized, and then a work-plan for that particular job is developed. Selection of BMPs will be managed differently for these two types of work.

Selection of BMPs for regularly scheduled work will be done at the beginning of each season (coincides with activity type). Aquatic herbicide application, for example occurs in late summer/early fall. At the beginning of the season, technical staff will review all of the work areas and select appropriate BMPs to respond to site conditions. The BMPs will be incorporated into the work order. If there are questions regarding specific environmental issues, appropriate staff will be consulted and their input will be incorporated.

For work not on a regular schedule, BMP selection is called out in the Resource Protection Protocol. The watershed engineer will, as part of the project design criteria, select BMPs that are

appropriate to the particular job and incorporate them into the design package. The BMPs will be called out in the design documents and incorporated into the work order. If there are questions regarding specific environmental issues, appropriate staff will be consulted and their input will be incorporated.

Implementation of Best Management Practices

Best Management Practices will be implemented by lead staff assigned to a specific project. For most projects this would be the Senior Maintenance Worker. The BMPs will be implemented as they are called out in the work order. If site conditions or other factors require a BMP to be changed or make it no longer relevant to the project, the assigned lead on the job will consult with appropriate staff (watershed engineer, qualified environmental staff, etc.) and get authorization to modify the BMPs. Modifications to BMPs will be noted as an addendum to the work order.

Monitoring of Best Management Practices

Monitoring of BMPs will be carried out as part of the work and assigned to the lead staff on a particular project as a general rule. Exceptions would be where the individual BMP requires a particular field of expertise to carry out the monitoring (i.e. water quality sampling, fisheries monitoring). In that instance, qualified staff would be included in the work order as a resource for BMP implementation.

Changes in Best Management Practices

The Best Management Practices section of the Stream Maintenance Program is intended to be a living document and to change over the life of the program. The annual Resource Protection Protocol in Chapter 3 of the Stream Maintenance Program includes a “lessons learned” step to evaluate and improve all aspects of the maintenance program, including the BMPs. As BMPs are used and ways are seen to improve their effectiveness, they will be modified to reflect the changes. As new BMPs are found or technology improves, the program will incorporate them to further protect resources.

Reporting on Best Management Practices

Reporting on modification to BMPs made as a result of the “lessons learned” process will be done as part of the normal reporting practices called out in the Stream Maintenance Program.

Supporting Documents

The BMPs are supported by other District documents that provide more specificity for maintenance project design and implementation.

These documents are attached to the SMP:

- Appendix C. Nesting Migratory Bird Procedure
- Appendix D. Dryback/Fish Relocation Protocol
- Appendix E. Programmatic Impact Assessment and Mitigation for Routine Bank Protection Activities

These documents are available from the District:

- District Channel Maintenance Guidelines
- Bay Area Stormwater Management Agency Association BMPs (2001)

BMP List

The list of BMPs gives a BMP identification number which is used for reference in the SMP and EIR, followed by a short BMP Title, a summary Description of the measure, and the Activity to which the measure will generally apply. The abbreviation for activity is:

SR	Sediment Removal
VM	Vegetation Management
BP	Bank Protection
MM	Minor Maintenance
All	All Routine Maintenance

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1. Water Quality
The District shall implement measures to protect water quality, to reduce short-term increases in turbidity, and to maintain the geomorphic integrity of the channels.

BMP	Title	Description	Activity
1.1	Conduct Work During Low Flow Periods	Work instream shall be performed from the spring to fall months when low to no flows are present in the channels. For minor work activities that will occur in the channel, work will be conducted from the top of the bank if access is available and there are flows in the channel.	All
1.2	Tidal Work Areas	<p>For tidal areas, a downstream cofferdam is constructed to prevent the work area from being inundated by tidal flows. By isolating the work area from tidal flows, water quality impacts are minimized. Downstream flows continue through the work area and through pipes within the cofferdam.</p> <ol style="list-style-type: none"> 1: Installation of coffer dams will begin at low tide. 2: If work can be completed or staged when the work area is not under water, coffer dams will not be necessary. 3: Cofferdams in tidal areas can be made from earthen material. If earth is used, the downstream and upstream faces shall be covered by a protected covering (e.g., plastic or fabric) if needed to minimize erosion. 	SR
1.3	Dewater/Bypass Water at Non-tidal Sites	<p>If water is present at the work site, diversion structures (which can be made of sheet piles, inflatable dams, sand bags, river run gravel, or other similar materials) shall be constructed, as needed, to isolate the work area and avoid or minimize downstream water quality impact. Depending on the channel configuration, water is allowed to either continue flowing downstream or is diverted around the work site in a pipe (pumped or gravity) or open channel.</p> <ol style="list-style-type: none"> 1: All water shall be discharged in a non-erosive manner (e.g., gravel or vegetated bars, on hay bales, on plastic, on concrete, or in storm drains when equipped with filtering devices, etc.). 2: Sumps or basins may also be used to collect water, where appropriate (e.g., in channels with low flows). 3: Where feasible and appropriate, diversion structures shall be installed on concrete sections of the channels or constructed of materials other than imported earthen fill. Earth fill cannot be used for cofferdams in non-tidal areas. 4: In conjunction with diversion structures, pumps or gravity-fed pipe systems are used to de-water sites. 5: Depending on the channel configuration, sediment removal may occur within a "live" stream—a stream where the flows are not bypassed around the work site; however, during excavation activities, a berm of sediment is left between the work area and stream flows to minimize water quality impacts. 6: In non-tidal channels with anadromous fisheries, diversions shall maintain habitat connectivity and result in no changes in flow quality or quantity from pre-project conditions. 	SR BP

BMP	Title	Description	Activity
1.4	Avoid Erosion When Restoring Flows	<p>All temporary diversion structures shall be removed within 48 hours of completion of work. Flows shall be restored in a manner that minimizes erosion.</p> <ol style="list-style-type: none"> 1: When diversion structures are removed, to the extent practicable, the ponded flows will be directed into the low-flow channel within the work site to minimize downstream water quality impacts. 2: Flows shall gradually be restored to the channel to avoid a surge of water that would cause erosion or scouring. 3: Passed flows can be slowly reintroduced into the dewatered area by leaving a silt barrier in place to allow water to slow and drop sediment to the extent possible. 	SR BP
1.5	Erosion and Sediment Control Measures	<p>Erosion control methods shall be used as appropriate during all phases of routine maintenance projects to control sediment and minimize water quality impacts. The District shall prevent erosion on steep slopes by using erosion control material according to manufacturer's specifications. Appropriate measures include, but are not limited to, the following:</p> <ol style="list-style-type: none"> 1. Silt Fences 2. Straw Bale Barriers 3. Brush or Rock Filters 4. Storm Drain Inlet Protection 5. Sediment Traps 6. Sediment Basins 7. Erosion Control Blankets and Mats 8. Soil Stabilization i.e.: Tackified straw with seed, jute or geotextile blankets, etc. <p>The following Bay Area Stormwater Management Agency Association BMPs provide guidance and specifications as to implementation of the erosion control measures described:</p> <p>SC-3. Sediment Basins SC-4. Straw or Sand Bag Barriers SC-5. Sediment Traps SC-6. Silt Fences SS-1. Erosion Control Blankets, Mats, and Geotextiles VR-1. Brush or Rock Filters VR-2. Check Dams VR-4b. Temporary Outlet Protection VR-4b. Storm Drain Inlet Protection WD-1. Earth Dike WD-1. Slope Drain WD-3. Temporary Drains and Swales</p>	BP
1.6	Use of Wheel and Track Mounted Vehicles in Stream Bottoms	<p>District personnel shall use the appropriate equipment for the job that minimizes disturbance to the stream bottom. Appropriately-tired vehicles, either tracked or wheeled, shall be used depending on the situation:</p> <ol style="list-style-type: none"> 1. Tracked vehicles (bulldozers, loaders) may cause scarification. 2. Wheeled vehicles may cause compaction. 	SR BP

1.7	Pump/ Generator Set Operations and Maintenance	<p>Pumps and generators shall be maintained and operated in a manner that minimizes impacts to water quality and aquatic species.</p> <ol style="list-style-type: none"> 1. Pumps and generators shall be maintained according to manufacturers' specifications to regulate flows to prevent dryback or washout conditions. 2. Pumps shall be operated and monitored to prevent low water conditions, which could pump muddy bottom water, or high water conditions, which creates ponding. 3. Pump intakes shall be screened to prevent uptake of fish and other vertebrates. 	SR BP MM
1.8	Handle Sediments So As to Minimize Water Quality Impacts	<p>Sediments shall be stored and transported in a manner that minimizes water quality impacts.</p> <ol style="list-style-type: none"> 1. Wet sediments may be stockpiled outside of a live stream or may be stockpiled within a dewatered stream so water can drain or evaporate before removal. This measure applies to saturated, not damp, sediments and depends upon the availability of a stockpile site. 2. For those stockpiles located outside the channel, water draining from them will not be allowed to flow back into the creek or into local storm drains that enter the creek, unless water quality protection measures recommended by the RWQCB are implemented. 3. Trucks may be lined with an impervious material (e.g., plastic), or the tail gate blocked with dry dirt or hay bales, for example, or trucks may drain excess water by slightly tilting their loads and allowing the water to drain out. 4. Water shall not drain directly into channels (outside of the work area) or onto city streets without providing water quality control measures. 5. Streets shall be cleaned of mud and/or dirt by street sweeping, as necessary, and not by hosing down the street. 	SR
1.9	Soil Stockpiles	If soil is to be stockpiled, no run-off will be allowed to flow back to creek.	SR

1.10	Avoid Exposing Soils with High Mercury Levels	<p>Bank Protection projects in portions of the Guadalupe River watershed affected by historical mercury mining may expose soils containing mercury which can affect stream water quality.</p> <ol style="list-style-type: none"> 1. In the specified channel reaches in the Guadalupe River Basin, soils that are likely to be disturbed or excavated shall be tested for Mercury (Hg). Soils shall be remediated if: <ol style="list-style-type: none"> a. disturbed or excavated soils exposed to flood flows below the 2.33-year channel flow level exceed 1 ppm Hg, or b. disturbed or excavated soils above the 2.33-year flow level exceed 20 ppm Hg. 2. Remediation can be accomplished either by: <ol style="list-style-type: none"> a. treating the site so that contaminated soils excavated for the purpose of installing bank protection will not be susceptible to erosion, or b. by further excavating contaminated soils and replacing them with clean fill or other bank protection materials that are free from contaminants. c. Soils with mercury concentrations exceeding 20 mg/kg will be removed and disposed of in a Class I landfill following established work practices and hazard control measures. 3. To ensure worker safety is protected during bank protection projects with elevated mercury concentrations in the exposed surfaces, personal protective equipment will be required during project construction to maintain exposure below levels established by the Occupational Safety and health Agency (OSHA). 	BP
1.11	Concrete Use Near Waterways	<p>Concrete that has not been cured is alkaline and can increase the pH of the water; fresh concrete will be isolated until it no longer poses a threat to water quality.</p> <ol style="list-style-type: none"> 1. Wet sacked concrete shall be excluded from the wetted channel for a period of two weeks after installation. During that time, the wet sacked concrete shall be kept moist (such as covering with wet carpet) and runoff from the wet sacked concrete shall not be allowed to enter a live stream. 2. Poured concrete shall be excluded from the wetted channel for a period of two weeks after it is poured. During that time, the poured concrete shall be kept moist, and runoff from the wet concrete shall not be allowed to enter a live stream. Commercial sealants (e.g., Deep Seal, Elasto-Deck Reservoir Grade) may be applied to the poured concrete surface where difficulty in excluding water flow for a long period may occur. If a sealant is used, water shall be excluded from the site until the sealant is dry. 3. Dry sacked concrete shall be excluded from the wetted channel for a period of 30 days after installation. Each day during that time, it shall be watered down without causing runoff to the live stream. 4. Designate an area outside of the channel and floodplain to clean out concrete transit vehicles. 	BP
1.12	Groundwater Management	<p>If high levels of groundwater in a work area are encountered, the water is pumped out of the work site. If necessary to protect water quality, the water shall be directed into specifically constructed infiltration basins, into holding ponds, or onto areas with vegetation to remove sediment prior to the water re-entering a creek. Water pumped into vegetated areas will be pumped in a manner that will not create erosion around vegetation.</p>	SR BP

1.13	Prevent Scour Downstream of Sediment Removal	<p>Sites in the transport zone on alluvial fans may cause increased scour downstream if they experience rapid sediment accumulation after sediment removal.</p> <p>Channel reaches up to 500 feet downstream from such sediment removal sites will be monitored to determine whether accelerated erosion is occurring. If downstream monitoring indicates that erosion is occurring, then remedial action such as rock vortex weirs or similar protection shall be carried out.</p>	SR
1.14	Minimize Sediment Transport Downstream from In-channel Herbicide Sites	<p>Where sediment has accumulated due to vegetation in-channel, herbicide application may result in release of sediment downstream.</p> <p>Prior to herbicide application within active channels, the potential for significant sediment release will be assessed. If the site has the potential for significant sediment release, then one of two techniques will be considered:</p> <ol style="list-style-type: none"> 1. Where an area has not been routinely treated with herbicides, phase new herbicide applications over several seasons, or 2. Remove the excess sediment through mechanical means after the vegetation is killed. 	VM
1.15	Prevent Erosion Downstream of Bank Protection Sites	<p>Increased water velocity at bank protection sites may increase erosion downstream.</p> <p>Bank stabilization site design will assess hydraulic effects immediately upstream and downstream of the work area.</p> <p>If the hardscape revetment would cause significant increase in erosion potential, downstream energy dissipation features such as pools or grade control structures shall be considered in the design.</p> <p>If the evaluation identifies possible downstream impacts, proactive protection of these areas shall be provided. Such measures include, but are not limited to, coir logs, riparian enhancement planting, strategic placement of rock, and flow deflectors.</p>	BP
1.16	Minimize Local Erosion Increase from In-channel Vegetation Removal	<p>In-channel vegetation removal may result in increased local erosion due to increased flow velocity.</p> <p>To minimize the effect, protect the toe of the bank by leaving vegetation to the maximum extent possible consistent with the maintenance guidelines.</p>	VM

2. Vegetation
The District shall strive to minimize vegetation removal and shall revegetate sites as appropriate to provide erosion control and restore riparian habitat value.

BMP	Title	Description	Activity
2.1	Minimize Vegetation Removal	<p>Vegetation control and removal in channels, on streambanks, and along levees and maintenance roads shall be limited to removal necessary for facility inspection purposes, removal that is necessary to meet regulatory requirements, removal that is required to comply with fire codes, and removal that is required to meet capacity requirements per Maintenance Guidelines.</p> <ol style="list-style-type: none"> 1. The District has developed detailed Maintenance Guidelines to address the ongoing need for maintenance of vegetation or sediment in modified streams and channels. The guidelines are engineering-based and outline the level of maintenance required to ensure adequate flood protection capacity is maintained in the streams and canals within the District's jurisdiction. 2. Decisions regarding the necessity of routine sediment removal and vegetation management activities (to restore channel flow capacities) will be made following the thresholds established in the guidelines. This information will be used to formulate in part an annual routine maintenance work plan. 3. No more than one-quarter acre of wetland or riparian vegetation will be removed during minor work activities. 	<p>All</p> <p>All</p> <p>MM</p>
2.2	Minimize Stream Access Impacts	<p>District personnel shall use existing access ramps and roads where possible. If new access points are necessary, they shall be constructed in a manner that minimizes impacts to streams: New access points shall be created as close to the work area as possible to minimize running equipment down stream channels.</p> <ol style="list-style-type: none"> 1. On temporary access points, remaining disturbed soil shall be compacted and seeded immediately after construction of new access points. 2. New access points will be constructed so as to minimize adverse impacts, such as tree removal, whenever possible. 3. If the access point is to be permanent, the road or ramp will have a gravel surface. 4. Any temporary fill used for access shall be removed upon completion of the project. Channel topography and geometry shall be restored to pre-project conditions to the extent possible. 	<p>SR</p> <p>BP</p>
2.3	Minimize Hardscape in Bank Protection Design	<p>The District shall select bank repair techniques appropriate to a given site based on hydraulic and other site conditions. Refer to SMP Appendix E. Programmatic Impact Assessment and Mitigation for Routine Bank Protection Activities .</p> <ol style="list-style-type: none"> 1. Biotechnical repair methods include live construction, willow wattling, erosion control blankets, brush matting, and installation of root wads and boulders in banks. 2. The repair will be designed and installed so that it will be self-sustaining and use vegetation that adds structural integrity to the stream bank. 	<p>BP</p>
2.4		<p><i>[This BMP intentionally left blank for any future additions.]</i></p>	

2.5	Planting	Planting for erosion control and habitat restoration shall be in accordance with District revegetation guidelines.	BP
2.6	Mulching	<p>Bark and other wood products shall be used as needed to prevent erosion of bare soil after construction is completed.</p> <ol style="list-style-type: none"> 1. All newly planted and/or bare soil (excluding bare channel bottoms) in maintenance areas shall have a minimum 3" thick layer of bark or mulch installed except when the area is seeded. In that case, the thickness of the mulch layer shall not exceed ½ inch. 2. This bark or mulch can be ground-up woody products and/or leaves from either native material or from soil suppliers. 3. No non-native material that has allelopathic compounds (<i>Eucalyptus</i> spp.) or weed seeds shall be used as mulch in areas where it has the potential to inhibit native revegetation. Such areas would include floodplains and revegetation sites. 4. Any material imported from outside the District that is to be used as mulch will be certified as weed-free to the extent that certification is possible. 	BP
2.7	Seeding	<p>For banks that are scraped during sediment removal, an erosion control seed mix will be used.</p> <ol style="list-style-type: none"> 1. A typical mix may consist of California native grasses (e.g., <i>Hordeum brachyantherum</i>, <i>Elymus glaucus</i> 'Berkeley,' <i>Bromus carinatus</i>) on slopes flatter than 3:1. <i>Vulpia microstachyes</i> may be added to the mix where slopes are steeper (e.g., 2:1). 2. Another seed mix may be of 'Escort' sterile wheat to provide a year's worth of protection. This mix is used only if further work is required the following year. 3. Temporary earthen access roads will be seeded when site and horticultural conditions are suitable. 	SR
2.8	Replace Trees	<p>The District shall replace trees as follows:</p> <ol style="list-style-type: none"> 1. Native trees between 6 and 18 inches in diameter at breast height (dbh) that are lost due to bank protection impacts will be replaced at a ratio of 3:1. Non-native trees between 6 and 18 inches dbh will be replaced at a ratio of 1:1 with appropriate native species. 2. Trees removed for installation of bank protection measures shall be replaced at the site, if feasible, or at the mitigation site created for that bank protection activity. 3. The Plant Selection Criteria, Planting Techniques, Maintenance, and Monitoring/Reporting protocols prescribed by the "Protocol for Revegetation Associated with Bank Protection" (Appendix E of SMP) shall be implemented, as applicable to tree replacement. 4. Replacement of heritage-sized trees (greater than 18 inches dbh) will be consistent with local ordinances. 	BP

2.9	Revegetation Site Maintenance	Follow-up maintenance shall be performed on sites that have been seeded and planted. 1. Maintenance shall include replacing dead or dying plants where appropriate, weeding, removing non-native plant colonizers, and ensuring that all plants receive sufficient water. 2. Irrigation shall be implemented as needed throughout the establishment period.	BP
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3. Wildlife and Fisheries

The District shall implement measures to minimize impacts to native species, especially special-status and riparian dependant species.

BMP	Title	Description	Activity
3.1	Minimize Impacts to Special-status Plants and Animals Via Site Assessments and Avoidance Measures	<p>To avoid and minimize impacts to special-status plant and wildlife species, the annual work program shall be reviewed, and each site where special status species have been found, have been known to exist in the recent past, or are likely to occur because suitable habitat exists, will be visited by a biologist or qualified personnel under the direction of a biologist. For animal species the site surveys will be no more than 30 days prior to the start of construction or during the time of the year the species is expected to occur on-site, to determine presence of special-status species. For plant species the surveys will be conducted during the appropriate time of the year to determine presence. Information regarding the presence of special-status species on a particular worksite shall be based on the District's GIS database and professional experience of qualified staff.</p> <ol style="list-style-type: none"> 1. The District shall use its GIS database to identify potential special-status plant and animal habitats. All projects falling within sensitive habitats will be discussed with biological staff to identify avoidance and minimization measures. 2. All populations detected during the surveys will be assessed and mapped. This information will be entered into the District's GIS system for future management purpose. 3. If maintenance activities are scheduled in the vicinity of extant populations, qualified personnel under the direction of a biologist will clearly identify the populations on site and stake or flag a buffer zone around the population in which activities are to be avoided. 4. Avoidance of impacts to serpentine areas or other sensitive plant habitats may include storing removed sediment offsite, limiting the method of vegetation removal to manual methods, and limiting the operation of maintenance equipment to established roads whenever possible. 5. Vegetation management in sensitive plant areas will use only hand control or backpack herbicide application by operators trained to identify and avoid the species to be protected. 6. If sensitive animals such as western pond turtles or California red-legged frogs are found, a qualified biologist will remove them to suitable habitat outside of the project limits. Moving animals will be consistent with applicable Fish and Wildlife Service and Fish and Game permits. 7. The results of all sensitive species surveys will be reported to the Fish and Wildlife Service, National Marine Fisheries Service and the California Department of Fish and Game in an annual report. All surveys will be reported to the CNDDDB. 8. The District will develop and distribute informational pamphlets entitled "Sensitive Plants, Wildlife, and Fish at your Worksite." These pamphlets are designed to inform staff about sensitive species and environmental protocols and procedures. 	All

3.2	Minimize Impacts to Nesting Birds Via Site Assessments and Avoidance Measures	<p>District personnel shall conduct SMP work in a manner consistent with the protocols established by the most current version of the District's Nesting Migratory Bird Procedure:</p> <ol style="list-style-type: none"> 1. Project areas will be checked by qualified personnel under the direction of biologists for nesting birds prior to starting work if the work has the potential to impact nesting birds. 2. If nesting birds are found, implementation of a project may be delayed until after nesting is completed. Work may occur if an adequate buffer, as determined by a qualified biologist, can be established between the maintenance activity and nests. 	All
3.3	Avoid serpentine habitat	<p>The District shall identify serpentine areas and avoid disturbance to these areas to the extent possible.</p> <ol style="list-style-type: none"> 1. The District shall use its GIS database to identify serpentine areas near work areas and avoid and minimize impacts to all stands of native vegetation that may provide suitable habitat for special-status plants and invertebrates to the greatest extent possible. 2. Avoidance measures may include storing removed sediment offsite, limiting the amount of vegetation to be sprayed and removed in serpentine areas, and limiting the operation of maintenance equipment to established roads whenever possible. 3. Facilities crossing serpentine soil grasslands shall be permanently marked in the field (and in the District GIS) and will include 100 ft. buffer zones. No upland herbicides will be used in these marked areas. Aquatic herbicides may be used after July 1. Upland vegetation control using hand labor may occur after June 15. 4. Facilities crossing serpentine soil shrub lands and woodlands will be surveyed by a qualified botanist. Areas supporting sensitive species shall be permanently marked in the field (and in the District GIS) and will include 100 ft. buffer zones. No upland herbicides will be used in these marked areas. Aquatic herbicides may be used after July 1. The botanist will determine what area's vegetation management using hand labor may occur after June 15. Buffer zones around individual plants or populations may be established. 	All
3.4	Mitten Crab Control Measures	<p>Sediment from the San Francisco Bay Watershed, including that for reuse, will not be removed to areas any farther south than Coyote Valley or outside of the San Francisco Bay watershed unless previously authorized by CDFG. This measure is to avoid transporting mitten crabs, a highly invasive, exotic species, to areas where they are not currently found.</p>	SR
3.5	Minimize Loss of Aquatic Habitat from Bank Protection Work	<p>Follow SMP Appendix E. Programmatic Impact Assessment and Mitigation for Routine Bank Protection Activities.</p>	BP

3.6	Remove Sediment from One Side of Large Channels in Alternate Years	<p>Some channels are large in the sense that sediment removal operations must be conducted from both sides of the channel. Remove sediment in large channels from one side only in alternate years to minimize vegetation removal and retain emergent vegetation, which is used for food, cover, fish spawning and nursery areas, and wildlife movement corridors. According to the Maintenance Guidelines, this measure applies to the following channel reaches (Station Nos.):</p> <ol style="list-style-type: none"> 1. Stevens Ck. (0+00–146+00) 2. Calabazas Ck. (0+00–102+00) 3. San Tomas Ck. (0+00–151+40) 4. Alamitos Ck. (42+65–218+00) 5. Guadalupe River (230+00–387+50) 6. Berryessa Ck. (0+00–200+00) 7. Lower Penitencia (0+00–40+00) 8. Silver Ck. (100+00–315+40) 9. Thompson Ck. (0+00–48+00) 	SR
3.7	Salvage Native Aquatic Vertebrates from Dewatered Channels	<p>If fisheries or native aquatic vertebrate are present when cofferdams, water bypass structures, and silt barriers are to be installed, a fish and native aquatic vertebrate relocation plan will be implemented to ensure that fish and native aquatic vertebrates are not stranded:</p> <ol style="list-style-type: none"> 1. In non-tidal channels, where water is to be diverted, prior to the start of work or during the installation of water diversion structures, native aquatic vertebrates will be captured in the work area and transferred to another reach as determined by a qualified biologist (refer to Fish Relocation Guidelines) 2. Aquatic invertebrates will not be transferred (other than incidental catches) because of their anticipated abundance and colonization after completion of the repair work. 	SR BP
3.8	Minimize Effects of Bypass Structures on Steelhead	<p>To prevent increases in temperature and decreases in dissolved oxygen (DO), if bypass pipes are used, they shall be properly sized (i.e., larger diameter pipes to better pass the flows). Bypass pipes may also be avoided by creating a low-flow channel or using other methods to isolate the work area.</p>	SR BP
3.9	Retain Woody Materials and Vegetation	<p>Woody material (including live leaning trees, dead trees, tree trunks, large limbs, and stumps) will be retained unless it is threatening a structure or impedes reasonable access.</p> <ol style="list-style-type: none"> 1. Retain and flag stumps, snags, and branches in channels that can create fish habitat. 2. Ensure that this woody debris does not impede water flow and does not contribute to erosion. 3. When woody material is removed, priority will be given to reuse of the materials in bank protection projects. Non-native species containing allelopathic compounds will not be used for construction of bank protection projects. Woody materials may also be used as mulch. (See BMP 2.6) 4. When retention will not compromise flood management system reliability, woody vegetation shall be left in place. 	BP MM

3.10	Conduct In-Channel Work During the Dry Season	<p>Avoid and minimize impacts to salmonids by timing stream maintenance projects in streams where there are or could be salmonids so that the use of heavy equipment in the channel is conducted outside of the migration and spawning season.</p> <ol style="list-style-type: none"> 1. Avoid use of heavy equipment during salmonid migration and spawning season between October 15 to June 15. 2. In-stream work in salmonid streams may be extended after October 15th under the following conditions: <ul style="list-style-type: none"> ❖ There has been no significant rainfall. ❖ A request for an extension has been submitted to California Department of Fish and Game in writing by October 1st. ❖ The project or projects for which extensions are being requested are at least 50% complete or can be completed within 5 business days. ❖ National Marine Fisheries Service and California Department of Fish and Game review the request and concur that an extension would not pose an undue threat to resources. ❖ No work under these conditions may occur after October 30th. 3. Minor maintenance activities that have no impact on fisheries may be done on all streams at any time of the year. These activities include fence repair, graffiti removal, tree pruning outside the low flow channel, revegetation maintenance, rodent control, and other activities that do not occur in the water. 4. In streams where there are or could be salmonids, minor activities will be done in channel if the activity is necessary to provide immediate flood protection. These activities include removal of trash or debris that will impede flows, trash rack cleaning, and pier nose cleaning. These activities will be done in a manner that is sensitive to protection of fisheries resources. 	SR BP
3.11	Avoid Dewatering an Entire Isolated Stream Reach	<p>Construction sites may be isolated by upstream or downstream barriers, such as culverts. In reaches that contain deep pools, the District shall maintain these pools as refuges by constructing temporary barriers so as to avoid pool destruction when preservation of the pool is not in the construction footprint or a barrier to project access. This BMP does not apply to sediment removal activities that require the removal of all sediment to restore the design capacity.</p>	SR BP
3.12	Maintain Low-low Fish Passage	<p>If site conditions after work create a flat channel bottom in non-tidal channels, a low flow channel will be created before reintroduction of flows to allow fish passage. The goal is to avoid sheet flow only a few inches deep. This measure does not apply to tidal areas.</p>	SR BP
3.13	Remove Temporary Fills as Appropriate	<p>Temporary fills, such as for access ramps, diversion structures, or cofferdams, shall be completely removed upon finishing the work, except where clean river run cobble/gravel was used. When appropriate, some or all of such material may be left in the channel to provide a substrate for aquatic species.</p>	SR BP
3.14	Maintain or Provide Escape Cover	<p>Stable undercut banks (generally those maintained by roots or boulders) shall remain in place. Larger boulders (≥2-foot diameter) with minimum 4-12" gaps used for rip-rap may provide cavities as escape cover that are not provided by sacked concrete, small rip-rap, or larger rip-rap with small rock in-fill.</p>	BP

3.15	Restore Pool Configuration of Channel Bottom	<p>The District shall re-grade the channel bottom at the end of the work project to as close to original conditions as possible.</p> <ol style="list-style-type: none"> 1. In areas used for migration by salmonids as designated on the District GIS Fisheries coverage, the depth and size of the low flow channel and pools shall emulate the pre-construction conditions as closely as possible, within the finished channel topography. 2. All material used to construct temporary fills will be removed upon completion of the project. 	SR BP
3.16	Restore Spawning Gravels in Work Site Areas	<p>The District shall replace gravels at the end of construction in potential salmonid spawning reaches.</p> <ol style="list-style-type: none"> 1. Spawning gravels removed as a result of stream maintenance activities in active spawning locations will be replaced using a gravel-cobble mixture with the following specification: the cobble/gravel material shall be made up of 30% 8-inch cobble, 30% 4-inch cobble, 30% 2-inch gravel, 10% ½-inch gravel, and no fines. 2. Spawning gravel replacement will be configured to maximize functional benefits including salmonid spawning, aquatic invertebrate production, and juvenile escape cover. 	SR BP
3.17	Reuse Sediments and Gravels As Appropriate	<p>Where practical, the District will reuse removed sediments and gravels.</p> <ol style="list-style-type: none"> 1. Sediments that are considered for re-use will be tested for hazardous materials and graded for structure as necessary in order to determine their appropriateness for re-use. When sediments or gravels are reused, the District will ensure that the reuse does not cause any additional erosion, siltation, or other negative environmental consequences. Reuse will be considered within the context of environmental, regulatory, and fiscal consequences. 2. Re-use will be considered within the context of environmental, regulatory, and fiscal consequences. 3. Sediments removed as part of routine stream maintenance activities may not be re-used in streams as part of the SMP. Re-use of sediments removed as part of routine maintenance will be negotiated under a separate permit. 	SR
3.18	Herbicide Use in Aquatic Areas	<p>Only herbicides and surfactants registered for aquatic use will be applied within the banks of channels within 20 feet of any water present.</p> <p>Aquatic herbicide use is limited to July 1st through October 15th, except on Guadalupe River, where it is limited to July 1st to August 15th. If rain is forecast within 24 hours, then application of aquatic herbicide will be rescheduled.</p>	VM

3.19	Develop a Biodiversity Monitoring Program	<p>The District commits to developing and implementing a biodiversity monitoring program in conjunction with SMP. The focus of the program will be on special-status species and their habitats. Monitoring results will be incorporated into future BMP and maintenance design through the “lessons learned” process of annual review (refer to SMP Figure 3-1) so as to more effectively conserve and restore stream habitats.</p> <ol style="list-style-type: none"> 1. Monitoring protocols for listed species will be approved by the Fish and Wildlife Service, National Marine Fisheries Service or California Department of Fish and Game as appropriate. 2. The results of all sensitive species monitoring will be reported to the Fish and Wildlife Service and the California Department of Fish and Game in an annual report. All surveys will be reported to the CNDDDB. 3. Monitoring will be conducted during the appropriate time of year for each species under investigation. 4. All populations detected during the monitoring will be assessed and mapped. This information will be entered annually into the District’s GIS system for future management purposes. 5. Sensitive species monitoring and baseline surveys may include activities such as: California red-legged frog surveys and western pond turtle trapping covering at least 20 miles of stream per year (repeat surveys every 5 years); survey at least 2 miles of California Clapper Rail habitat per 5 year for 5 years; map the distribution of pickleweed and cordgrass within and adjacent to District facilities every 5 years; survey at least 10 miles of creek annually for raptor nest locations; survey known burrowing owl locations on District facilities annually; survey at least 10 miles of creek annually for western leatherwood (repeat every 5 years); monitor distribution of Bay checkerspot and Opler’s longhorn moth habitat on District facilities every 3 years; monitor at least 2 miles of freshwater and tidal emergent marsh for sensitive bird use annually (repeat every 5 years); monitor at least 5 miles of riparian habitat annually for sensitive birds (yellow warbler) (repeat every 5 years); survey serpentine habitats for sensitive plants at least every 3 years. 6. Update the figure “Fisheries present in streams within jurisdiction of the Santa Clara Valley Water District” (Figure IVB1) every 5 years. 	All
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3.20	Minimize Adverse Effects of Herbicides on Non-target Species	<p>Herbicides are a key component of vegetation management under the SMP. Herbicides shall be used in a manner that minimizes negative environmental effects by avoiding impacts to non-target species. Herbicide use will be guided by label restrictions and any advisories published by the California Department of Pesticide Regulation (CDPR) or the County Agricultural Commission. The US EPA bulletin <i>Protecting Endangered Species, Interim Measures for Use of Pesticides in Santa Clara County</i> provides additional guidelines for herbicide use (US EPA 2000).</p> <ol style="list-style-type: none"> 1. Herbicide use will be reviewed annually prior to application using information from CDPR and US EPA maintained in the District GIS database to determine the potential presence of special-status species that could be adversely affected, and the target areas and chemicals used will be modified as necessary. 2. To avoid toxic effects to all life stages of California Red-legged Frogs (RLF), whenever herbicides are to be used in within 1.25 miles of known RLF locations, the District will refer to both the product label for the material being used and the Endangered Species Database maintained by the California Department of Pesticide Regulation and use the lower of the two recommended rates if there is a difference. 	VM
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3.21	Minimize Rodenticide Impacts on Non-target Species	<p>Burrowing rodents are controlled to minimize damage to levees on streams and canals. Rodent control areas will be reviewed for the potential presence of special-status species and the rodent control methods tailored to minimize non-target species impacts. When chemical control is necessary, the use will be guided by label restrictions and any advisories published by the California Department of Pesticide Regulation (CDPR) or the County Agricultural Commission. The EPA bulletin <i>Protecting Endangered Species, Interim Measures for Use of Pesticides in Santa Clara County</i> provides additional guidelines for rodenticide use (USEPA 2000).</p> <ol style="list-style-type: none"> 1. Within the potential range of salt marsh harvest mouse (SMHM) (as designated on the District's GIS), lethal rodent control methods shall not be used. The District defines potential SMHM habitat as all areas north of Highway 237 as shown in Figure IV B11, and will refine this definition as surveys are conducted to eliminate areas that are separated by barren ground by at least 10 yards from any halophytic vegetation. 2. In areas occupied by burrowing owls, fumigants shall not be used unless specifically determined safe by a qualified biologist. 3. The location of Burrowing Owls will be identified on the District's GIS system. 4. A 1/4 mile buffer zone around burrowing owl locations will be established. 5. If necessary alternative methods of rodent control will be determined by a qualified biologist. 6. The rodenticide applicator shall remove carcasses of poisoned animals, when they are found, to minimize secondary toxic effects on raptors or other wildlife. Carcass survey and disposal shall be performed in the treated area beginning on the third day following the initial exposure of toxic baits. Any exposed carcasses shall be disposed of in a manner inaccessible to wildlife. Carcass surveys shall continue for at least 5 days after toxic baiting has ceased and thereafter until no more carcasses are found. Any dead raptors or other wildlife found in the treated area during the carcass surveys shall be turned over to CDEG's pesticide lab for analysis. 	MM
3.22	Herbicide Use in Upland Areas	Application of herbicides to upland areas shall not be made within 24 hours of predicted heavy rainfall.	

4. Land Use and Public Safety			
The District shall minimize disturbance to the public and ensure public safety.			
BMP	Title	Description	Activity
4.1	Notify Local Governments of Scheduled Work	Notify cities and the County of proposed work by submitting the Annual Work Plan to the Public Works Departments and the District's Zone Advisory Committee.	All
4.2	Minimize Disturbances to Surrounding Neighborhoods	The District shall implement maintenance practices that minimize disturbances to neighborhoods surrounding work sites. <ol style="list-style-type: none"> 1. In general, work shall be conducted during normal working hours. Extending weekday hours and working weekends may be necessary to complete some projects. 2. Internal combustion engines shall be equipped with adequate mufflers. 3. Excessive idling of vehicles will be prohibited. 4. Levee traffic shall be limited to a speed of 15 miles per hour. 5. Access roads shall be watered as needed to control dust. 6. Dry sediment shall be wetted down or covered as needed to control dust during transport. 	All
4.3	Stabilized Construction Entrance	The District shall implement measures to minimize soil from being tracked onto streets near work sites: <ol style="list-style-type: none"> 1. Methods used to prevent mud from being tracked out of work sites onto roadways include installing a layer of geotextile mat, followed by a 4-inch thick layer of 1-3- inch diameter gravel on unsurfaced access roads. 2. Access shall be provided as close to the work area as possible, using existing ramps where available and planning work site access so as to minimize disturbance to the creek bed, creek banks, and the surrounding land uses. 	SR BP
4.4	Sanitary/Septic Waste Management	Temporary sanitary facilities shall be located on jobs that last multiple days. All temporary sanitary facilities shall be placed outside of the creek channel and floodplain.	All
4.5	Vehicle and Equipment Cleaning	District vehicles shall be washed only at the approved area in the corporation yard. No washing of vehicles shall occur at job sites.	All
4.6	Work Site Solid Waste Management	District employees and contractors shall clean the work site before leaving by removing all litter and construction related materials. The District's maintenance crews shall be responsible for all debris incurred as a result of construction and for cleaning up dumped material.	All
4.7	Herbicide Use Requirements	All herbicide use shall be consistent with approved product specifications. Applications shall be made by, or under the direct supervision of, State Certified applicators under the direction of a licensed Pest Control Advisor.	VM

4.8	Implement Public Safety Measures	<p>The District shall implement public safety measures during maintenance:</p> <ol style="list-style-type: none"> 1. Construction signs shall be posted at job sites warning the public of construction work and to exercise caution. 2. When necessary, a person shall be provided for traffic control. 3. If needed, a lane shall be blocked off to allow for trucks to pull into and out of the access points. 4. Where work is proposed adjacent to a recreational trail, warning signs shall be posted several feet beyond the limits of work. 5. Fencing, either the orange safety type or chain link, shall be installed above repair sites on bank stabilization projects. 	All
4.9	Notify Park Departments of Trail Closures	As part of the Annual Work Plan, The District will notify the park departments of trails that could be subject to closure. The type of work, location and duration of each project that will affect trail closures will be identified.	SR BP VM

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5. Air Quality

The District shall implement dust control measures at work sites to protect air quality and minimize effects on adjacent neighborhoods.

BMP	Title	Description	Activity
5.1	BAAQMD Basic Dust Control Measures	<p>The District shall implement BAAQMD Basic Control Measures at maintenance sites less than four acres in size. Current measures stipulated by the BAAQMD CEQA Guidelines include the following:</p> <ol style="list-style-type: none"> 1. Active maintenance areas shall be watered at least twice per day unless soils are already sufficiently moist to avoid dust. 2. Trucks hauling sediments and other loose material shall be covered or shall maintain at least two feet of freeboard. 3. Tailgates of trucks shall be sealed. 4. Trucks shall be brushed down before leaving the maintenance site. 5. Unpaved access roads and staging areas that are being used for the maintenance activity shall be watered three times daily, or non-toxic soil stabilizers shall be applied to control dust generation. 6. Paved maintenance site access roads shall be swept when visible soil material is carried onto the roadway. 	SR BP
5.2	BAAQMD Enhanced Dust Control Measures	<p>For single maintenance sites greater than four acres, the District shall implement BAAQMD Enhanced Dust Control Measures. These measures include the following:</p> <ol style="list-style-type: none"> 1. Inactive areas shall be sprayed with soil stabilizer or seeded. 2. Exposed stockpiles shall be watered, enclosed, covered, or sprayed with soil stabilizers. 3. Traffic speeds shall be limited to 15 mph. 4. Sandbags or other bank protections shall be installed to prevent silt runoff to roadways. 5. Vegetation in disturbed areas shall be replanted as soon as horticulturally appropriate. For example, plant material may not be ready as soon as the job is done (e.g. willow cuttings have to be collected during winter dormancy). 	SR BP
5.3	Avoid Stockpiling Potentially Odorous Sediments	<p>Some of the sediment removal sites will have sediment that is rich in organic matter decaying in an anaerobic conditions, which generates assorted malodorous gases, such as reduced sulfur compounds. These sediments shall be handled in a manner that avoids impacting sensitive receptors.</p> <ol style="list-style-type: none"> 1. The District shall avoid stockpiling potentially odorous sediments within 1000 feet of residential areas or other odor sensitive land uses. 2. Where appropriate, odorous stockpiles shall be disposed of at an appropriate landfill. 	SR

6. Hazardous Materials

The District shall implement hazardous materials protocols to protect environmental quality and public safety.

BMP	Title	Description	Activity
6.1	Spill Prevention	<p>The District shall prevent the accidental release of chemicals, fuels, lubricants, and non-storm drainage water into channels.</p> <ol style="list-style-type: none">1. District field personnel will be appropriately trained in spill prevention, hazardous material control, and clean-up of accidental spills.2. No fueling, repair, cleaning, maintenance, or vehicle washing shall be performed in the creek channel or in areas at the top of the channel bank that may flow into the creek channel.	All
6.2	Spill Kit Location	<p>Spill prevention kits shall always be in close proximity when using hazardous materials (e.g., crew trucks and other logical locations).</p> <ol style="list-style-type: none">1. Prior to entering the work site, all field personnel will know the location of spill kits on crew trucks and at other locations within District facilities.2. All field personnel will be advised of these locations and trained in their appropriate use.	All
6.3	Hazardous Materials Management	<p>The District shall implement measures to ensure that hazardous materials are properly handled and the quality of water resources is protected by all reasonable means when removing sediments from the streams.</p> <ol style="list-style-type: none">1. Prior to entering the work site, all field personnel will know how to respond when toxic materials are discovered.2. The discharge of any hazardous or non-hazardous waste as defined in Division 2, Subdivision 1, Chapter 2 of the California Code of Regulations shall be conducted in accordance with applicable State and federal regulations.3. All handling and disposal of sediments shall be performed in accordance with the WDR issued by the RWQCB. The sediment shall ultimately be disposed at a permitted landfill. Any alternative use or disposal will require RWQCB approval.	All
6.4	Vehicle and Equipment Fueling	<p>No fueling shall be done in the stream channel, or immediate floodplain, unless equipment stationed in these locations is not readily relocated i.e., pumps, generators. For stationary equipment that must be fueled on site, containment will be provided in such a manner that any accidental spill of fuel will not be able to enter the water or contaminate sediments that may come in contact with water. Any equipment that is readily moved out of the channel will not be fueled in the channel or immediate floodplain. All fueling done at the job site will provide containment to the degree that any spill will be unable to enter the channel or damage stream vegetation.</p>	All

6.5	Vehicle and Equipment Maintenance	<p>No equipment servicing shall be done in the stream channel or immediate floodplain, unless equipment stationed in these locations cannot be readily relocated i.e., pumps, generators.</p> <ol style="list-style-type: none"> 1. Any equipment that can be readily moved out of the channel will not be serviced in the channel or immediate floodplain. 2. All servicing of equipment done at the job site will provide containment to the degree that any spill will be unable to enter the channel or damage stream vegetation. 3. If emergency repairs are required in the field, only those repairs necessary to move equipment to a more secure location will be done in the channel or floodplain. 4. If emergency repairs are required, containment will be provided equivalent to that done for fueling or servicing. 	All
6.6	<i>Employee/ Contractor Training</i>	All appropriate District staff and contractors shall receive annual training on Stream Maintenance Program BMPs.	All

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7. Cultural Resources			
The District will protect cultural resources.			
BMP	Title	Description	Activity
7.1	Discovery of Cultural Remains or Historic Artifacts	<p>Work in areas where remains or artifacts are found will be restricted or stopped until proper protocols are met.</p> <ol style="list-style-type: none"> 1. Work at the location of the find will halt immediately within 30 feet of the find. If an archaeologist is not present at the time of the discovery, SCVWD will contact an archaeologist for identification and CEQA evaluation. 2. If the find is not significant, construction can continue. The archaeologist will prepare a brief informal memo/letter that describes and assesses the significance of the resource, including a discussion of the methods used to determine significance for the find. 3. If the find appears significant, the archaeologist will determine if the resource can be avoided and will detail avoidance procedures. 4. If the resource cannot be avoided, the archaeologist will develop within 48 hours an Action Plan to avoid or minimize impacts. The SCVWD field crew will not proceed until the Action Plan is approved by the SCVWD Watershed Manager. 5. The recovery effort will be detailed in a report prepared by the archaeologist in accordance with current archaeological standards. Any non-grave artifacts will be placed with an appropriate repository. 6. In the event of discovery of human remains, the field crew supervisor shall take immediate steps to secure and protect such remains. 7. The Santa Clara County Coroner shall be notified and informed of the find and of any efforts made to identify the remains as Native American. If the remains are determined to be from a prehistoric Native American, the medical examiner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours of notification. The NAHC then designates and notifies within 24 hours a <i>Most Likely Descendant</i> (MLD). The MLD has 24 hours to consult and provide recommendations for the treatment or disposition, with proper dignity, of the human remains and grave goods. 8. Preservation in situ is the preferred option, and if the District can do this without incurring potential future disturbance, then the MLD will usually recommend no further action. The remains and artifacts will be documented and the find location carefully backfilled to avoid further disturbance. 9. Human remains or cultural items exposed during maintenance that are subject to further disturbance will be exhumed archaeologically at the discretion of the MLD and reburied with the concurrence of the MLD in a place mutually agreed upon by all parties. 	All
7.2	Review of Projects with Native Soil	A cultural resources specialist will conduct a review and evaluation of those sites that would involve disturbance / excavation of native soil previously undisturbed by contemporary human activities to determine their potential for affecting significant cultural resources. The evaluation of the potential to	All

		<p>disturb cultural resources will be based on an initial review of archival information provided by the California Historical Resources System/Northwest Information Center (CHRIS/NWIC) in regard to the project area based on a 0.25 mile search radius. It is recommended that this initial archival review be completed by a professional archaeologist who will be able to view confidential site location data and literature to arrive at a preliminary sensitivity determination. If necessary, a further archival record search and literature review (including a review of the <i>Sacred Lands Inventory</i> of the Native American Heritage Commission); and a field inventory of the project area will be conducted to determine the presence/absence of surface cultural materials associated with either prehistoric or historic occupation. The results along with any mitigation and/or management recommendations would be presented in an appropriate report format and include any necessary maps, figures, and correspondence with interested parties. A summary table indicating appropriate management actions (e.g., monitoring during construction, presence/absence testing for subsurface resources; data recovery, etc.) will be developed for each project site reviewed. The management actions will be implemented on site to avoid significant effects to cultural resources.</p>	
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