

## Cultural Resources Procedures for Idaho NRCS Personnel

1. NRCS employees will determine if any of the proposed practices are *undertakings* with the potential to adversely affect cultural resources by using the *Idaho List of Undertakings Requiring No Further Section 106 Review In NRCS Idaho (Exemptions)* or the *Nez Perce Reservation Conservation Practices Exempted from Cultural Review* for projects within the Nez Perce Reservation. **Any activity or practice that will result in a potential adverse effect to a historic property is considered an undertaking regardless of its presence on this list.**
2. If all proposed practices are listed on the Exempt Practice List, the field office will document the finding on the CPA-52: *Environmental Effects for Conservation Plans and Area wide Conservation Plans* Form and proceed with practice planning and installation.
3. If any of the proposed practices are not on the Exempt Practice List, the field office will complete *NRCS Project Request for Cultural Resources Assistance* Form (ID-420-005) and send it to the NRCS Cultural Resource Specialist (CRS). The request will be filled out completely and include enough information for the CRS to evaluate the potential for cultural resources to be impacted by the proposed project. The project's area of potential effect (APE) will be defined on a legible 1:24,000 scale USGS quadrangle map and attached to the ID-420-005. All project activities, current and historic land use, and the presence of any existing buildings and other structures will be described on this form. A copy of this Assistance Form will be placed in the conservation plan folder.
4. The CRS will conduct a literature review and recommend one of the following with 14 days:
  - a) A field review is not needed.
  - b) An archaeological field review is needed.
  - c) In some cases, monitoring during implementation by a CRS or another professional archaeologist may be recommended in lieu of, or in addition to, the field review.
5. If a field review is not needed, the email response from the CRS will be placed in the cooperator's case file; the "cultural resources" section of the CPA-52 will be complete; and, project planning and installation will continue.
6. If a field review is needed, the CRS will send an email to the field office with information and instructions for completing this field review. The Field Office will contact a CRS to schedule this survey.
7. The CRS or an appropriately trained NRCS Cultural Resources Technician will conduct the survey as determined by the CRS. That individual will complete a cultural resources survey report with appropriate photos, site forms and maps. This report will be sent to the CRS for review. If necessary, CRS will send this survey report to the State Historic Preservation Office (SHPO), the appropriate Tribal Historic Preservation Office (THPO), or American Indian Tribe(s) for review. Upon receipt, the SHPO, THPO or Tribes will have thirty (30) days to review and comment on the project to the NRCS. **Practice implementation will not proceed until the Field Office receives confirmation that that the CRS, SHPO or THPO have concurred with the report findings; or, SHPO/THPOs 30-day comment period has expired.**
8. The CRS will send case file documentation to the Field Office. The field office will maintain all sensitive cultural resource site information in a secure file.

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9. Avoiding Impacts to Cultural Resources: It is NRCS policy to protect cultural resources in their original location to the fullest extent practicable by avoiding adverse impacts (GM-420, Part 401.20). Avoiding impacts will be accomplished through the following actions:

- a) The CRS, or another professional under the supervision of a CRS, will determine site boundaries.
- b) The CRS will consult with the SHPO, THPO, Field Office, and the landowner or other concerned parties on the best method to avoid impacts to the site.
- c) After impact avoidance measures have been implemented, planning/implementation of the undertaking can proceed.

NOTE: Avoiding impacts to cultural resources sites is not the same as site avoidance. Traditional site avoidance typically involves defining where the APE intersects the boundaries of the cultural resources site. Site avoidance is then accomplished by modifying or moving the APE. This traditional approach often causes site impacts which were not addressed in the original assessment. Proposed impact avoidance measures are not limited to site avoidance, but may also include:

- d) Critical area treatment with vegetative plantings to reduce long-term erosion on cultural resources sites and adjacent surroundings. These vegetative plantings can also serve as deterrents to vandalism, subtle marking of a site's boundary, etc.
- e) Limiting impacts to native vegetation present or adjacent to the site.
- f) Considerations of indirect impacts, such as access, traffic patterns, etc.
- g) Consideration of cumulative impacts.

10. If impacts cannot be avoided and the site is not eligible for NRHP, then:

- a) Where alternative, non-impacting conservation practices are feasible; NRCS will encourage cooperators to substitute these practices.
- b) If the cooperator declines implementing these alternative practices, then the NRCS will document this in the cooperator file and proceed with planning / implementation.

11. If adverse effects cannot be avoided to eligible Historic Properties, then:

- a) The State Conservationist may elect to proceed with the adverse effects and take steps to minimize or mitigate these effects in consultation with the SHPO, THPO, Tribes, and the ACHP (GM-420, Part 401.22); or
- d) If a mitigation plan cannot be agreed upon; Idaho NRCS will follow GM-420, Part 401.23 and will notify the landowner of the State Conservationist's intent to withdraw both financial and technical assistance.