

Supplement Analysis
for the
Columbia River Basin Tributary Habitat Restoration
Programmatic Environmental Assessment
(DOE/EA-2126/SA-67)

Lower Lemhi Reference Reach Phase 2
Bonneville project number 2010-072-00
Bonneville contract number 84063 REL 18

Bonneville Power Administration
Department of Energy



Introduction

In December 2020, Bonneville Power Administration (BPA) and the Bureau of Reclamation completed the *Columbia River Basin Tributary Habitat Restoration Programmatic Environmental Assessment* (DOE/EA-2126) (Programmatic EA). The Programmatic EA analyzed the potential environmental impacts of implementing habitat restoration actions in the Columbia River Basin and its tributaries.

Consistent with the Programmatic EA, this SA analyzes the effects of the Lower Lemhi Reference Reach Phase 2 Habitat Improvement Project (project). The project would implement many of the specific restoration actions assessed in the Programmatic EA in the Lower Lemhi River Valley in Lemhi County, Idaho. The goals of the project are to restore natural processes to the river and floodplain and improve the quality and availability of rearing habitat for Endangered Species Act (ESA)-listed salmonids by improving instream habitat diversity, reducing water velocities, reconnecting the floodplain, and increasing the density of native riparian plant communities.

This SA also evaluates whether the proposed project presents substantial new circumstances or information about the significance of the adverse effects that bear on the Programmatic EA's analysis and were not addressed in that document. The findings of this SA determine whether additional National Environmental Policy Act (NEPA) analysis is needed under 10 C.F.R. § 1021 *et seq.*

Proposed Activities

BPA proposes funding Trout Unlimited (TU) to complete the project located on the Lemhi River approximately 3 miles upstream of Salmon in Lemhi County, Idaho. This project is the second phase of a multi-phased project planned along approximately 1.2 miles of the Lemhi River from river mile (RM) 3.7 to 4.9 (Figure 1). The Phase 2 project area is along approximately 0.3 miles of stream channel from RM 3.9 to 4.2 (Figure 2). It encompasses the Phase 1 area and extends farther upstream. Phase 1 of the project, along approximately 0.2 miles of the Lemhi River near RM 4, was completed in summer 2021, and included bank stabilization using wood and riparian plant structures, construction of a riffle, and revegetation in the floodplain and riparian areas.

Phase 2 would address issues that have arisen since Phase 1 implementation, including head cutting and bank erosion along the upstream main channel and side channel, which would require earthwork and construction of riffles for grade control. Additional proposed actions during Phase 2 would include installation of engineered wood structures, native riparian plantings, and improvements to an existing, damaged diversion structure. Actions would slow the velocity of flows, activate more of the floodplain,

and increase habitat for adult and juvenile ESA-listed fish species, including Snake River Chinook salmon (*Oncorhynchus tshawytscha*), Snake River steelhead (*O. mykiss*), and bull trout (*Salvelinus confluentus*). Diversion structure improvements would reduce the number of times the private landowner enters the stream each year for maintenance, which would also benefit ESA-listed fish species.

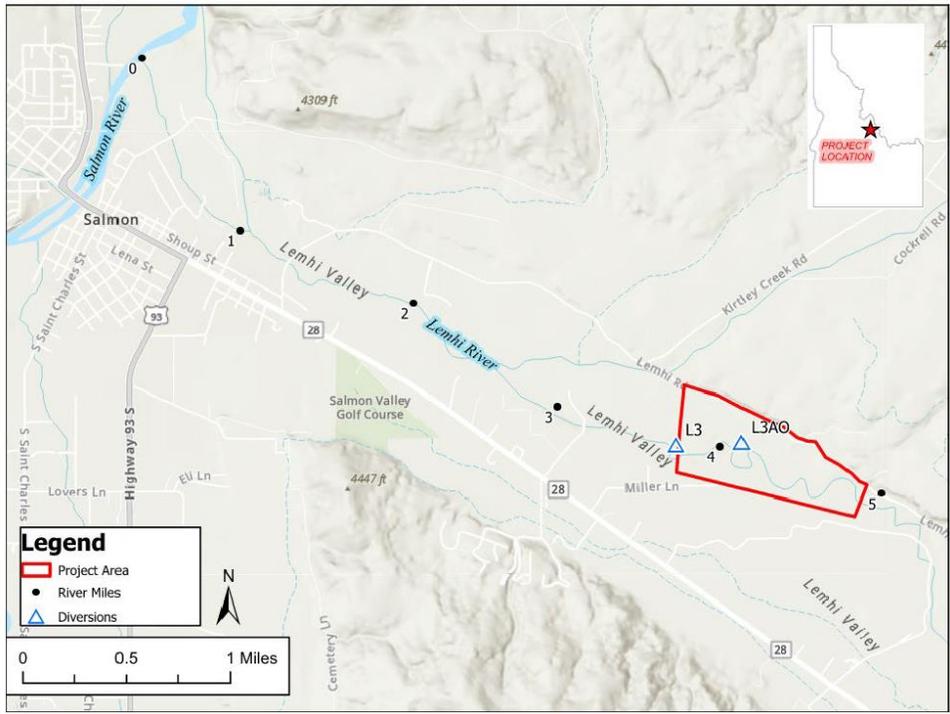


Figure 1. Area of multi-phased Lower Lemhi Reference Reach Project.



Figure 2. Location of Phase 2 project proposed actions within larger project area.

Approximately 3,100 cubic yards of material would be excavated along the main channel and side channel (up to 5 feet in depth). Excavated material would be used as fill for eroded banks along the main channel and side channel. Excess excavated material would be disposed of in upland areas or used for wood structure stabilization. Four engineered riffles would be constructed in the main channel and side channel (each about 150 to 300 feet long). Boulders, 24 inches in diameter or larger, would be buried throughout constructed riffles. Approximately 160 boulders would be placed throughout main channel riffles and 30 boulders would be placed in side channel riffles. Riffles would be designed to mimic natural riffle areas and facilitate channel elevation transitions between the upstream and downstream ends. One riffle in the main channel would also provide sufficient hydraulic head for the diversion at RM 4. This diversion consists of a 10-foot by 6-foot steel plate headwall with a 4-foot headgate and 16-foot-long, 36-inch-diameter corrugated metal pipe (CMP). Currently, the steel plate headwall is bent, the lifting mechanism of the gate is damaged, and the CMP is partially flattened. These diversion structures would be replaced in-kind in the same location.

Large wood habitat structures are proposed in the main channel, side channel, and floodplain to provide roughness and habitat throughout the project area. Multiple wood structure types are proposed across the project area, each designed for different applications, including 11 multi-log structures, about 33 single logs, 16 whole trees, and 10 floodplain roughness structures. A variety of log jams would also be installed, including one bleeder jam, four constriction jams, and six apex jams. Wood structures and jams would split flow; create in-channel complexity, velocity and depth variability, and cover; reduce the risk of avulsion; and capture sediment. To increase the stability of the wood structures, key pieces may be buried into the banks or streambed, ballasted with excess excavated streambed material, wedged between live trees, or a combination of all options. Racking and slash wood would be woven into open spaces in structures and live willow cuttings may be planted on top of structures.

Approximately 970 linear feet of willow baffles would be constructed on newly filled areas and in constructed riffles, near or above ordinary high water. Baffles would be constructed by digging a trench to just below groundwater level, placing a live willow cutting every foot, adding a mud slurry and slash wood surrounding the cutting, and backfilling with native materials. Roughened edge bank treatments (approximately 690 linear feet) consisting of logs buried at shallow angles into the bank, alternating between angled upstream and downstream, and filled with excess excavated material would be installed along banks in the main channel and side channel. Some of the bank treatments (approximately 230 linear feet) would be topped with a willow baffle angled above the river, perpendicular to flow.

Approximately 0.6 acres of riparian area, mainly areas that would have fill added during Phase 2, would be planted with potted or live stakes of native, riparian plants. Any riparian areas disturbed during construction would be seeded with a native, riparian seed mix (approximately 1.2 acres). All disturbed upland areas (approximately 3 acres), including temporary access routes and staging areas, would be roughened as needed and seeded with an agricultural seed mix. Cattle are currently excluded from the project area, but protective fencing may be installed around plants to provide browse protection from deer and elk.

Construction of instream work elements would take place within the approved in-water work window. Planting and protective fencing installation would occur during construction, in the fall, or the following spring. Site access, staging, and post-construction clean-up activities may take place prior to, during, or after the in-water work window. Proposed actions would be implemented in accordance with conservation measures outlined in BPA's Fish and Wildlife Habitat Improvement Program (HIP). Previously-established temporary access routes and staging areas from Phase 1 (originating from Miller Lane on the south side of the river and originating from Lemhi Road on the north side of the river), all on private pasture lands, would be used for construction access and staging. Additionally, a second temporary access route off Miller Lane (about 500 feet in length) and equipment staging and material

stockpile area (about 0.7 acres) would be established in Phase 2 on private pasture land. The proposed temporary staging and stockpile areas at these locations would occur a minimum of 150 feet from the nearest waterway. Features requiring excavation in the river and along the banks would require the use of temporary coffer dams to isolate work areas from active river flows to reduce turbidity impacts. Fish within these isolated work areas would be salvaged by experienced and permitted personnel before construction started in those areas. Erosion and sediment controls would be installed and maintained throughout construction and until all disturbed soils are revegetated or stabilized. Work would require the use of heavy equipment such as excavators, dump trucks, and bulldozers.

TU would monitor the effectiveness of the actions for several years after construction is complete. If failures in system function, structure function and integrity, or risks to infrastructure, riverscape processes, or fish passage occur, TU would implement adaptive management procedures. These procedures would include similar actions to those proposed for Phase 2 and would be within the same project footprint, including but not limited to additional earthwork, installation of new wood structures, and modification of structures. TU would also implement adaptive management procedures if there were low survival or establishment of native vegetation in restored areas, including replanting and adding browse protection fencing as needed.

Funding this project would fulfill commitments under the 2020 National Marine Fisheries Service Columbia River System Biological Opinion (2020 NMFS CRS BiOp) and the 2020 U.S. Fish and Wildlife Service Columbia River System Biological Opinion (2020 USFWS CRS BiOp). These actions also support BPA's commitments to the State of Idaho in the Columbia River Fish Accord, as amended, while also supporting ongoing efforts to mitigate for effects of the Federal Columbia River Power System on fish and wildlife in the mainstem Columbia River and its tributaries pursuant to the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act) (16 U.S.C. 839 *et seq.*).

Environmental Effects

The implementation of this project requires the use of construction crews and equipment which would disturb and displace soil in and along the stream, damage vegetation, produce noise and vehicle emissions, and temporarily increase vehicle traffic and human activity in the project area. Chapter 3 of the Programmatic EA, as summarized in relevant parts below, discusses typical environmental disturbances and impacts stemming from habitat restoration in the Columbia River basin. Below is a description of the potential site-specific effects of the project and an assessment of whether these effects are consistent with those described in the Programmatic EA.

1. Fish and Aquatic Species

The effects of using mechanized equipment and manually working in and along the Lemhi River are consistent with the analysis in the Programmatic EA, Section 3.3.1.2 ("*Environmental Consequences for Fish and Aquatic Species*"), which describes overall low impacts to fish and aquatic species after considering moderate short-term adverse effects and beneficial long-term improvements.

ESA-listed Snake River Chinook salmon, Snake River steelhead, and bull trout, and their designated critical habitats are present within the project area. No other state or ESA-listed aquatic species are known to be present within the project area. BPA completed an ESA Section 7 consultation on the effects of the project's actions on these species in its HIP programmatic consultation, which found that such actions would likely adversely affect these species and their designated critical habitat in the short term but would not likely result in jeopardy to the species or result in destruction or adverse modification of their designated critical habitat.

The short-term adverse effects of the project would expose, displace, reconfigure, or compact earth using mechanized equipment within and along the Lemhi River. It would likely create conditions where small amounts of sediment could be released for short periods of time. The amount of sediment

anticipated from the project would be moderate because there would be some instream excavation for grading along banks, constructing riffles, and installing wood structures, including bank stabilization structures. Mitigation measures would be applied, such as isolating instream work areas from flows, installing temporary erosion controls before starting work, locating equipment fueling areas at least 150 feet from the stream, and working during the approved in-water work window to avoid impacts to fish life at critical life stages, as detailed in the Programmatic EA. Though the amount of sediment discharged would be elevated, turbidity levels would be below levels harmful to fish and at durations not anticipated to cause harm as evaluated in Section 3.3.1.2.1 of the Programmatic EA (*“Short-Term Effects to Fish and Aquatic Species from Construction Activities”*).

Movement, sounds, and vibrations from construction-related human and mechanical activity would likely temporarily disturb and displace fish and aquatic organisms from their preferred habitats for the duration of the disturbance. The project area has limited vegetation that would screen human activity during work activities within and along the river. Some work sites would require work area isolation using coffer dams. Fish trapped in isolated areas would need to be salvaged and relocated to free-flowing portions of the river. Fish salvage involves electroshocking, capture, and handling to relocate the fish. This is stressful for individual fish but avoids leaving the fish stranded in a dewatered location. The anticipated amount of activity and aquatic species disturbance is consistent with the analysis in Sections 3.1.3.1 and 3.3.1.2.1 of the Programmatic EA (*“Dewatering for Instream Work”* and *“Short-Term Effects to Fish and Aquatic Species from Construction Activities,”* respectively). The Programmatic EA disclosed direct, harmful, and sometimes fatal impacts to aquatic species, including displacement of fish from their preferred habitat during periods of movement, sounds, and vibrations from human and mechanical activity.

The project’s long-term beneficial effects include creation of more complex habitats through improvements to the main and side channel including constructed riffles and wood structures, an increase in floodplain access, and enhanced riparian cover. These beneficial effects are consistent with the analysis in Section 3.3.1.2.2 of the Programmatic EA (*“Effects to Fish and Aquatic Organisms unique to the Categories of Action”*).

2. Water Resources

The effects of using mechanized equipment and manually working in and along the Lemhi River are consistent with the analysis in Section 3.3.2.3 of the Programmatic EA (*“Effects Conclusion for the Proposed Action on Water Resources”*), which describes overall low water quality impacts after considering short-term adverse effects and beneficial long-term effects. There would be no effect on water quantity from water withdrawals. The diversion that exists within the project area would be replaced with the same materials and equipment, but there would be no change to the water rights assigned to that diversion. There would, however, be the potential for improved water quantity from increased recharge of groundwater since the connection between surface flows and the floodplain would be increased over both space and time.

Overall, this project would create short-term, localized sediment inputs from the impacts of using mechanized equipment along and within the river while excavating and filling areas around established channels, constructing riffles, and installing wood and vegetation structures. Restoration actions would disturb lengths of stream or riverbank consistent with the analysis in Section 3.3.2.2.1 of the Programmatic EA (*“Sedimentation and Turbidity Effects”*), but resulting sediment discharges likely would not be greater than what occurs naturally during annual high-flow events. These short-term effects would be lessened by the application of mitigation measures, such as installing sediment barriers in all work areas and removing vegetation and soil from equipment before starting work and where feasible, operating equipment from the bank or previously cleared areas, as detailed in Section 2.4 of the Programmatic EA (*“Mitigation Measures and Design Criteria”*). The project may also cause short-term increases in stream temperature due to construction-related disturbance of riparian vegetation and the

channel. The long-term effects of this project, however, would be a decreased potential for unnatural sediment inputs by stabilizing currently eroding banks; an increased potential of the floodplain to effectively manage its sediment loads; and a reduction of stream temperatures from improved stream form, instream habitat structure, and increased riparian vegetative cover. These long-term beneficial effects are consistent with those described in the Programmatic EA.

3. Vegetation

The effects of using mechanized equipment and manually working in and along the Lemhi River are consistent with the analysis in Section 3.3.3.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Vegetation"*), which describes overall moderate impacts to vegetation after considering moderate short-term adverse effects and beneficial long-term effects. There are no state or ESA-listed plant species present in the project area.

Project implementation, including excavation and fill activities, structure installation, and establishment of staging areas and access routes would have moderate short-term impacts on vegetation. Plants within the project area would be removed, graded over, and trampled during implementation. Disturbance to riparian areas would be minimized per mitigation measures, such as seeding and planting native species in any disturbed areas and preventing the spread of noxious weeds by washing construction equipment and applying weed control measures at the site. Vegetation impacts would also be mitigated by planting willow baffles throughout the floodplain and along banks. Increased floodplain inundation would improve water-tolerant vegetation diversity and density in the long-term. Thus, the overall effects of the project would be moderate and would be consistent with the effects described in the Programmatic EA.

4. Wetlands and Floodplains

The effects of using mechanized equipment and manually working in and along the Lemhi River are consistent with the analysis in Section 3.3.4.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Wetlands and Floodplains"*), which concluded that overall impacts to wetlands and floodplains would be low after considering high, short-term, adverse effects and highly beneficial long-term effects.

A wetland delineation was conducted in 2022, and five wetlands were identified in the project area. Two are associated with irrigation ditches and a cattle watering pond. These areas (approximately 3 acres total) are heavily impacted by cattle grazing and agricultural activities in ditches and fields, are outside the cattle exclusion fencing for the project, and would not be disturbed by project activities. The other three wetlands (approximately 7 acres total) are all classified as emergent, riverine wetlands, likely forming as a result of Phase 1 activities. Proposed activities would not overlap or impact two of the riverine wetlands, one near the upstream boundary and one near the downstream extent of the project. By design, proposed construction activities for Phase 2 would occur in one riverine wetland (approximately 2 acres in size) that encompasses portions of the side channel and floodplain. Wood structures and willow baffles would be installed using heavy equipment, which would have short-term negative impacts. Prior to work occurring in a delineated wetland, TU would obtain required permits issued by the U.S. Army Corps of Engineers under the Clean Water Act, and adhere to all requirements, conditions, and prescriptions set forth. There would be adverse impacts in the short term, but improved wetland conditions would follow project completion.

This project is anticipated to have fewer impacts than that described in the Programmatic EA. There would be less short-term adverse effects to floodplains and wetlands than described in the EA because heavy equipment use would be limited to small areas where structures would be installed rather than wholesale reshaping of floodplains and river channels as described in the EA.

Consistent with the Programmatic EA, there would be long-term beneficial effects from implementation of this project. There would be increased connectivity between the river and its floodplain from

installation of wood structures and willow baffles and construction of riffles to slow stream flow, facilitate more natural lateral movement, increase inundation of the floodplain, and provide for more efficient sediment movement and retention in the floodplain.

5. Wildlife

The effects of using construction equipment and manually working in and along the Lemhi River are consistent with the analysis in Section 3.3.5.3 of the Programmatic EA ("*Effects Conclusion for the Proposed Action on Wildlife*"), which describes low impacts overall to wildlife after considering certain moderate-to-high short-term adverse effects to individual wildlife species, such as potential construction-related mortality, and highly beneficial long-term effects.

No ESA-listed or state-listed wildlife species are known to exist within the proposed project area. The USFWS Information for Planning and Conservation (IpaC) tool lists three ESA-listed Threatened species, Canada lynx (*Lynx canadensis*), yellow-billed cuckoo (*Coccyzus americanus*), and North American wolverine (*Gulo gulo luscus*), as having the potential to occur in the project area. There is no designated critical habitat for these species and no confirmed presence in the project area. The monarch butterfly (*Danaus plexippus*), ESA-proposed Threatened, and Suckley's cuckoo bumble bee (*Bombus suckleyi*), ESA-proposed Endangered, also have the potential to be present in the project area, but there is no designated critical habitat within the project area. Due to current agricultural/grazing land use practices and nearby residences, desired habitat conditions and sufficient food sources for ESA-listed and proposed species are not abundant in the project area and it is unlikely these species would be present in the project area. Therefore, the project would have no effect on ESA-listed wildlife species.

Bald eagles (*Haliaeetus leucocephalus*) and golden eagles (*Aquila chrysaetos*) are present in Lemhi County year round. There is no confirmed presence of nests or previously used nest sites for either species in the project area and IpaC information indicates that both species are less likely to be present in or near the project area in July and August, when most construction activities would take place. This is also the end of the breeding season for both species so if a nest is not present at the start of construction, it is unlikely either species would be near the project area or try to build a nest after construction started. If a nest is observed in the project area, TU would employ protection measures (e.g., timing, distance) as necessary to ensure eagles would not be harmed as a result of the project. Bald and golden eagles could benefit from the project in the long-term from an increased source of food coming from improved fish and wildlife habitats in the area. Therefore, the project would have no adverse impacts to bald and golden eagles.

The short-term effects from this project would be less than those analyzed in the Programmatic EA, because the planned restoration actions would have far less impact to soils and vegetation, and thus, to wildlife habitat. Human presence would cause sound and movement that temporarily disturbs or displaces local wildlife. Construction activities would destroy the habitats of small animals but would only temporarily displace medium-sized or larger animals from their preferred habitats during construction, and they would likely re-occupy the site once human activity has moved or ceased. Construction activities wouldn't begin until July, and would thus avoid disturbance to migratory bird nesting, which occurs in the spring. Abundant similar wildlife habitat is present adjacent to the project area, these effects would be limited in duration, and there would be long-term beneficial improvement of wildlife habitat and no long-term negative changes to wildlife habitat. This level of effect would be low, as stated in the Programmatic EA.

6. Geology and Soils

The effects of using mechanized equipment and manually working in and along the Lemhi River are consistent with the analysis Section 3.3.6.3 of the Programmatic EA ("*Effects Conclusion for the Proposed Action on Geology and Soils*"). This section describes moderate-to-high short-term effects, but moderate overall effects after accounting for mitigation measures and long-term benefits.

The short-term effects from this project would be less than those analyzed in the Programmatic EA because the planned restoration actions here would have far less impacts to soils. The project would disturb soils over approximately 5 acres during construction. There would be no large-scale earthmoving, and thus, no widespread mixing of soil horizons or severe compacting of soils. Though heavy machinery would impact soils during fill and excavation activities, riffle construction, wood structure installation, and diversion replacement, these areas are generally small, widely spaced, and the project would be implemented with mitigation measures designed to reduce adverse effects, such as minimizing the area of impact, applying erosion control measures, and site decompaction and seeding.

Long-term improvement to soils is expected once disturbed surfaces are seeded and riparian plantings are established and stabilize the soil surface. Long-term improvement to sediment transport and floodplain access within the project reach would restore natural sediment-forming processes.

7. Transportation

The effects of this project in and along the Lemhi River are consistent with the analysis in Section 3.3.7.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Transportation"*), which describes low impacts to transportation.

The main effect the proposed restoration action would have on transportation would be vehicles transporting workers and equipment to the project site sharing local roads with other traffic. Project vehicles would access the site via Lemhi Road on the north side of the river and Miller Lane on the south side of the river. No roads would be closed; none would be temporarily blocked; none would be relocated. Temporary access routes would be on existing private farm roads or pasture land. This level of impact would be low, as stated in the Programmatic EA.

8. Land Use and Recreation

Impacts to land use and recreation are consistent with the analysis in Section 3.3.8.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Land Use and Recreation"*), which concludes that land use practices at underlying project sites would remain unchanged in most cases. The project is located on privately-owned lands used for agriculture. Existing exclusion fencing keeps cattle out of the river and riparian areas on both sides of the river. There is no public access or public recreational opportunities. Land uses would not change because of the project – land would remain in agricultural production and cattle would continue to be excluded from the river and riparian areas – and public recreational opportunities would not change.

9. Visual Resources

The effects of the proposed project in and along the Lemhi River is consistent with the analysis in Section 3.3.9.3 (*"Effects Conclusion for the Proposed Action on Visual Resources"*), which describes low impacts to visual resources.

The proposed project is not located in a visually sensitive area and is over a mile from Highway 28, the nearest major highway. The project would be visible to people driving on Lemhi Road or Miller Lane. Road users and nearby landowners would see heavy equipment during construction and may see new wood and vegetation structures across the floodplain and exposed soils during earthwork activities. After vegetation re-establishment, the project area would have a natural appearance and would not visually detract from the area.

10. Air Quality, Noise, and Public Health and Safety

The effects of the proposed project in and along the Lemhi River is consistent with the analysis in Section 3.3.10.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Air Quality, Noise, and Public Health and Safety"*). This section describes low impacts to air quality, noise, and public health and safety.

Air quality impacts from exhaust and dust emissions from construction equipment would be temporary and localized in nature, with no long or short-term violations of state air quality standards expected as a result of project implementation. Although construction, transportation, and site-rehabilitation activities would temporarily elevate ambient noise levels at the construction site, the project would not result in long-term changes to noise levels. The nearest residences are relatively close to the project (about 500 feet), but these are landowners that TU has coordinated with to plan the project and they would be informed of construction timing. Construction activities would take place during daylight hours only and would produce noise at similar levels to ongoing agricultural operations in the area. Although construction, transportation, and site-rehabilitation activities would temporarily elevate ambient noise levels at the construction site, the project would not result in long-term changes to noise levels. Adequate signage and other routine safeguards would minimize risks to worker and public safety for the duration of construction and site restoration.

11. Cultural Resources

The effects of this restoration action in and along the Lemhi River are consistent with the analysis in Section 3.3.11.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Cultural Resources"*), which describes low impacts to cultural resources because cultural resources would be avoided by project construction and effects would be appropriately resolved through the National Historic Preservation Act Section 106 consultation process.

A cultural resources survey and subsequent consultation with the Idaho State Historic Preservation Office (SHPO), the Confederated Salish and Kootenai Tribes, and the Nez Perce Tribe of Idaho was completed for the area potentially affected by the project. On October 6, 2022, BPA consulted with the consulting parties on the effects of the Lower Lemhi Reference Reach Phase 2 Habitat Improvement project area (BPA CR Project No.: ID 2022 023). An intensive cultural resource survey and exploratory subsurface shovel probing of the Area of Potential Effect (APE) was conducted. BPA made a determination of no historic properties affected. On October 20, 2022, SHPO concurred with BPA's determination and concluded that the proposed work would have no effect to historic properties (SHPO Project No.: 2022-629). No response was received from the other consulting parties.

As described in the Programmatic EA, the results of this consultation were that the project would not adversely affect historic properties. In the unlikely event that cultural material is inadvertently encountered during the implementation of this project, BPA would require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA in consultation with the appropriate consulting parties.

12. Socioeconomics

The effects of this restoration project in and along the Lemhi River are consistent with the analysis in Section 3.3.13.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Socioeconomics and Environmental Justice"*), which describes low impacts to socioeconomics.

As described in the Programmatic EA, none of the restoration actions would generate a requirement for additional permanent employees, and the actions would not result in a requirement for individuals to leave the local area or relocate within it. There would be no effect on housing available for local populations. This project would not displace people or eliminate residential suitability from lands being restored, or from lands near the restoration project site. The project would generate short-term employment for those directly implementing the restoration actions and would provide small short-term cash inputs to local businesses for fuel, equipment, and meals. This degree of effect would be low.

13. Climate Change

The effects of this project in and along the Lemhi River are consistent with the analysis in Section 3.3.14.3 of the Programmatic EA (*"Effects Conclusion for the Proposed Action on Climate Change"*), which describes low impacts to climate change.

Due to the short duration of construction activities and the relatively small number of vehicles and equipment involved, project-related greenhouse gas emissions are anticipated to be low. This minimal contribution to climate change would be offset to some degree by the increased functioning of the floodplain including increased water table inputs, increased carbon sequestration in expanded and improved wetland habitats, and potentially, decreased water temperatures from improved instream and riparian habitat conditions.

Findings

BPA finds that the types of restoration actions and the potential impacts related to the proposed *Lower Lemhi Reference Reach Phase 2 Habitat Improvement Project* are similar to those analyzed in the *Columbia River Basin Tributary Habitat Restoration Programmatic Environmental Assessment* (DOE/EA-2126) and Finding of No Significant Impact. There are no substantial changes in the EA's Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the EA's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9.¹ Therefore, no further NEPA analysis or documentation is required.

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Concur:

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¹ BPA is aware that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this SA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*