Supplement Analysis
for the
Columbia River Basin Tributary Habitat Restoration
Programmatic Environmental Assessment
(DOE/EA 2126/SA-80)

Mill Creek Passage Restoration at Gose Street
Bonneville project number 2009-026-00
Bonneville contract number 97655

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 Mill Creek Passage Restoration at Gose Street Project (project). The project would implement many of the specific restoration actions assessed in the Programmatic EA along Mill Creek in Walla Walla County, Washington. The goals of the project are to improve fish passage for Endangered Species Act (ESA)-listed Middle Columbia River steelhead (*Oncorhynchus mykiss*) and bull trout (*Salvelinus confluentus)*, and to raise and widen the downstream reach so that the system functions more naturally and future channel incision and fish passage issues are minimized.

This SA analyzes the site-specific impacts of the Mill Creek Passage Restoration at Gose Street Project to determine if it is within the scope of the analysis considered in the Programmatic EA. This SA also evaluates whether the proposed project presents substantial new circumstances or information about the significance of the adverse effects that were not addressed by the EA.

Proposed Activities

BPA proposes funding the Tri-State Steelheaders (TSS) to complete the project located on Mill Creek in Walla Walla County, Washington, less than 0.5 miles west of the city limits of Walla Walla. The project area starts at the Gose Street bridge, at river mile 4, and runs approximately 1,360 feet downstream (Figure 1). At the upstream end of the project area there is a transition from an engineered flood control channel lined with riprap and concrete (i.e., the Mill Creek Flood Control Project maintained by the U.S. Army Corps of Engineers), to a concrete fishway abutting the end of the flood control channel, and finally to a more natural stream (Lower Mill Creek) with bed and banks composed of cobble and gravel (Figure 2). Lower Mill Creek is straight, confined, and lacking sediment, as the flood control infrastructure captures the sediment coming from upper reaches of Mill Creek. Lower Mill Creek has become incised at the transition from concrete to natural stream and there is currently a 5-foot drop between the two, creating a velocity and structural passage barrier for adult salmonids. Temporary measures have been implemented, but the seasonal high flows of Mill Creek compromise the fix each year and regular adjustments are needed. This project is intended to be a long-term solution and would modify the fishway, widen the downstream channel, and raise the stream bed elevation to reduce turbulence and support fish passage. In addition, the project would add sediment, construct riffles and pools, add boulders, and plant riparian vegetation to support function of a more natural stream reach.

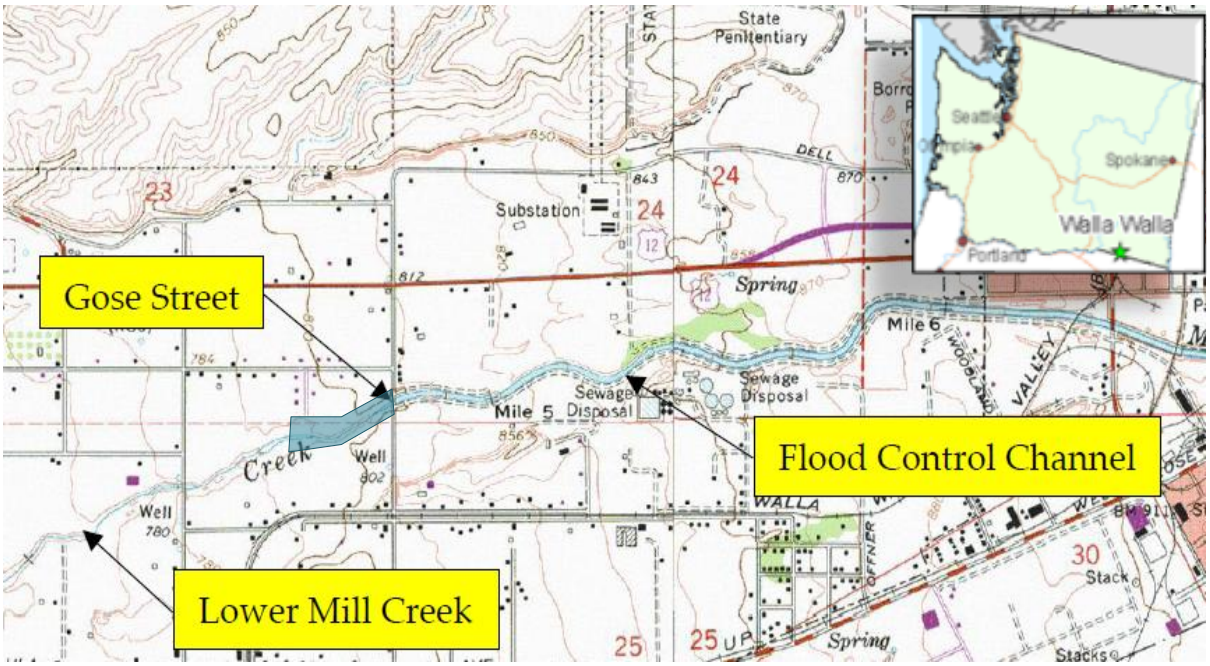

Figure 1. Project area (shaded in blue), starting at Gose Street.

Figure 2. The upstream flood control project and the project area, starting at the Gose Street bridge and including the fishway (approximately 60 feet) and 1,300 feet of natural channel.

The project would modify the fishway by widening the structure to provide a less turbulent fish passage zone, adjusting the slope of the wall along the left bank to alleviate constriction of flood flows, and raising interior weir walls to reduce the drop from one to the next to facilitate high flow adult fish passage and low flow juvenile fish passage. Modifications to the downstream natural stream channel would include excavation of approximately 21,000 cubic yards of stream bed and bank to widen the channel, expanding it from 20 feet to 50 feet wide, and creating more naturally sloping banks. The top several feet (up to 6 feet) of soil in bank and upland excavated areas would be decompacted to loosen soil for future planting. Excess excavated material would be used in reconstruction of the channel or

gravel augmentation along the banks. Riffles, pools, and a roughened channel segment would be constructed along the newly widened channel by adding approximately 8,000 cubic yards of imported streambed material (about 4 feet deep) and covering it with existing excavated material and fines. An approximately 80-foot-long by 5-foot-deep scour pool would be constructed immediately downstream of the concrete fishway. Continuing downstream, the project would construct 19 riffles, each about 30 feet long, and bury habitat boulders of about 48 inches in diameter throughout (about 160 across all riffles). Pools would be constructed in a meandering path along the low flow channel between each riffle and be about 3 feet to 5 feet deep. About 16 gravel piles (approximately 5,000 cubic yards total), 2 feet to 3 feet in height, would be added to banks on both sides of the channel and placed so as not to overlap any pools or take up more than half the channel width. The intention of the gravel piles would be to augment the channel with fines during high flow events, compensating for the lack of fines coming from the flood control project and reducing the risk for channel incision. A steeper, roughened channel, approximately 140 feet long, would be buried at the downstream end of the project to help prevent future incision of the channel at the project's end. This section would be created by compacting 4 feet to 6 feet of imported streambed material, deepest at the downstream end, and backfilling with up to 6 feet of existing excavated material to match the existing grade. Overall, the channel bed would be raised approximately 6 feet to 10 feet.

Construction access would be through private property. Existing farm roads would be used where possible. Approximately 0.5 miles of new, temporary routes of travel would be created by driving across pastures. A new, permanent easement road for utility access would be constructed since the project would remove the old easement road with the widening of the channel. The new easement road would be about 350 feet long and 14 feet wide and be constructed by compacting approximately 3 feet of gravel material from excess excavation materials. The end of the easement road would intersect with Gose Street, and the project would install approximately 370 feet of chain link fence and an access gate along the property line boundary with Gose Street. Three temporary equipment and material staging areas, totaling approximately 1 acre, would be established. A cofferdam would be installed at the upstream end of the project reach, and a 48-inch-diameter bypass pipe would be used to route water downstream to isolate the work area 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. Approximately 1.5 acres of upland area and 0.5 acres of riparian area, including temporary access and staging areas, would be seeded and planted with potted or live stakes of native plants suited for each zone after construction is complete.

Construction of instream work would take place within the Washington Department of Fish and Wildlife approved in-water work window (July 15 to September 15). Planting 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).

TSS 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, TSS would implement adaptive management procedures. These procedures may include additional raising of the channel bed, excavation of the low flow channel, repair of the roughened channel, and gravel augmentation. TSS 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 if 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 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. (USC) 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 Mill Creek 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 steelhead and bull trout are present in the project area, as it is designated critical habitat for both species. 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. No other state or ESA-listed fish or aquatic species are known to be present within the project area.

Surface flow would be diverted through a bypass pipe and the entire project area would be isolated from flow during construction. The project would expose, displace, reconfigure, or compact earth using mechanized equipment within and along Mill Creek in the isolated area to widen the channel; construct riffles, pools, and a roughened channel; and cut and pour concrete to modify the fishway. Sediment from construction activities would be mobilized for a short period of time when the project area is rewatered. Sump pumps would be used in construction areas to pump concrete cutting and construction water discharge away from surface flow and groundwater to minimize the amount of mobilized sediment in the dewatered area. Other mitigation measures would be applied, such as 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 temporarily elevated during rewatering, 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 temporarily disturb and displace fish and aquatic organisms from their preferred habitats for the duration of the disturbance. Once flow is diverted through the temporary bypass pipe, fish trapped in the isolated project area would be salvaged and relocated to free-flowing portions of the river. Fish salvage involves electroshocking, capture, and handling. This is stressful for individual fish but avoids leaving the fish stranded in a dewatered location. However, the project area currently has limited vegetation providing cover and very little instream habitat for fish to occupy and is used primarily as a

migration route rather than as holding or rearing habitat. Because implementation would be done during the in-water work window (outside of migration timing), few salmonids are expected to be present and require salvage. 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 improved migration access and passage for adult and juvenile fish and creation of more stream cover and instream habitat through the addition of pools, riffles, habitat boulders, and riparian plantings. 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 Mill Creek 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 long-term effect on water quantity from water withdrawals or on water quality from construction activities. Overall, the project would create short-term, localized sediment input during rewatering due to mobilization of some of the sediment disturbed in the isolated channel due to use of mechanized equipment to excavate banks, widen the channel, modify the concrete fishway, and construct pools, riffles, and a roughened channel. Restoration actions would disturb lengths of stream or riverbank consistent with the analysis in Section 3.3.2.2.2.1 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, removing vegetation and soil from equipment before starting work, and using sump pumps to isolate construction water and dispose of discharge away from the creek, as detailed in Section 2.4 of the Programmatic EA ("*Mitigation Measures and Design Criteria*"). The long-term effects of this project, however, would be creation of a low flow channel to support fish passage and riparian plantings that would provide the system with shade, bank stability, and reduced erosion and sedimentation during high flows. 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 Mill Creek 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 and establishment of staging areas and access routes, would have moderate short-term impacts on vegetation. There are some riparian shrubs and trees (*e.g.,* willows and alders) along the top of the steep banks near the concrete fishway, providing a thin buffer between the bank and the adjacent properties. However, invasive blackberry is the other dominant vegetation in this area. The remainder of the project reach has very little riparian vegetation and nothing providing shade or cover along the banks. Upland areas mainly consist of pasture lands with non-native grasses. Plants within the project area would be removed, graded over, and trampled during implementation. Disturbance to riparian areas would be minimized per mitigation

measures identified in Section 2.4 of the Programmatic EA ("*Mitigation Measures and Design Criteria*"), such salvaging and replanting native plants in the construction area, preventing the spread of noxious weeds by washing construction equipment and applying weed control measures at the site, and planting native trees, shrubs, and grasses in any disturbed areas after construction. 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 equipment and manually working in and along Mill Creek 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.

The channel throughout the project reach is highly incised with steep, vertical banks about 20 feet high, resulting in a disconnected floodplain. There are no wetlands in the project area, excluding the channel itself which is classified by the National Wetlands Inventory as a permanently inundated riverine habitat. By design, proposed construction activities would occur in the channel and heavy equipment use and earth-moving activities during project construction would have short-term negative impacts. Prior to construction, TSS 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 riverine wetland conditions would follow project completion.

Since the project is located within a Federal Emergency Management Agency designated floodway, there would be no work to reconnect the floodplain. Inundation limits would be slightly wider in the channel after project construction as compared to current conditions, but there would be no work in the floodplain or to reconnect the floodplain. 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 there would be less extensive earth-moving, no actions occurring within the floodplain, and heavy equipment use would be limited to small areas of grading and fill rather than wholesale reshaping of the channel as described in the EA. Consistent with the Programmatic EA, there would be long-term beneficial effects from implementation of this project from riparian habitat improvements related to proposed planting activities in the riparian area.

5. Wildlife

The effects of using construction equipment and manually working in and along Mill Creek 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 tools lists the yellow-billed cuckoo (*Coccyzus americanus*), ESA-listed Threatened, and the monarch butterfly (*Danaus plexippus*), ESA-proposed Threatened, as having the potential to be present in the project area. There is no designated critical habitat for ESA-listed or proposed wildlife species in the project area and no confirmed presence of any of the species in the project area. Due to current agricultural land use practices and nearby residences limiting habitat and food sources for these species, it is unlikely these species would be present in the project area and the project would have no effect on ESA-listed wildlife species.

The short-term effects from this project would be less than those analyzed in the Programmatic EA, because the proposed actions would have far less impact to soils and vegetation, and thus, to wildlife habitat. There would be no large-scale upland earthmoving, with its associated vegetative loss and

small animal impacts. In the short term, 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 would occur in mid- to late summer, and would thus avoid disturbance to migratory bird nesting, which occurs in the spring. 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 Mill Creek are consistent with the analysis in 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 would have far less impacts to soils. 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 where fill and excavation would occur, overall, this area is generally small (less than 2 acres) and the project would be implemented with mitigation measures identified in Section 2.4 of the Programmatic EA ("*Mitigation Measures and Design Criteria*") designed to reduce adverse effects, such as minimizing the area of impact and applying erosion control measures. Long-term improvement to soils is expected once disturbed surfaces are seeded and riparian plantings are established and stabilize the soil surface.

7. Transportation

The effects of this project in and along Mill Creek 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 project 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 Gose Street on the east side, Rome Street on the south side, and Newtown Road on the north side. No roads would be closed; none would be temporarily blocked; none would be relocated. Temporary access routes would be on private 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 that have no public access and no public recreational opportunities. The properties bordering Mill Creek in the project area total approximately 66 acres and are all zoned as "Rural Residential" per Walla Walla County. Approximately 0.6 acres of this area (less than 1 percent) would be lost to support restoration activities, mainly due excavation for proposed channel and bank widening actions. Otherwise, land uses would not change because of the project and public recreational opportunities on this private land would not change.

9. Visual Resources

The effects of the proposed project in and along Mill Creek are 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 restoration action is in a residential-agricultural area with urban influences, as it is just outside the city limits of Walla Walla. People driving on local roads and landowners would be able to see construction equipment and staging areas during project implementation, but it would be difficult to see activities occurring in the channel. Project construction would result in some short-term visual impacts, including some disturbance that detracts from the view, such as the excavation and widening of the banks and the concrete work on the fishway. Post construction, there would be visible presence of a modified fishway and newly planted native plants along banks. Work performed at stream level would still be difficult to see. Visual impacts would last for only a few weeks during staging, construction, and replanting. After vegetation re-establishment, the project area would have a natural appearance and would not visually detract from the area. This level of impact would be low, as stated in the Programmatic EA.

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

The effects of the proposed project in and along Mill Creek are 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 of 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 because of project implementation. Although construction, transportation, and site rehabilitation 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 (less than 200 feet), but these are landowners that TSS has coordinated with and executed agreements to work on their properties. Property owners 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 would temporarily elevate ambient noise levels at the construction site, the project would not result in long-term changes to noise levels.

Some potential safety impacts are anticipated from construction vehicles using public roads to access the project area. However, adequate signage and other routine safeguards would minimize risks to workers and public safety for the duration of construction and the project would not impact public safety infrastructure or burden emergency services. This level of impact would be low, as stated in the Programmatic EA.

11. Cultural Resources

The effects of this restoration action in and along Mill Creek 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 Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Confederated Tribes and Bands of the Yakama Nation (YN), Nez Perce Tribe (NPT), and Washington State Department of Archaeology and Historic Preservation (DAHP) was completed for the area potentially affected by the project.

On May 20, 2025, BPA consulted with the consulting parties on the effects of the Mill Creek Passage Restoration at Gose Street project area (BPA CR Project No.: WA 2025 082) and made a determination of no historic properties affected. On May 20, 2025, DAHP concurred with BPA's effects determination (DAHP Log No. 2025-01-00317). On May 22, 2025, the NPT Tribal Historic Preservation Office responded deferring to CTUIR. No response was received from CTUIR or YN.

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 Mill Creek 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 proposed 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 project site. The project would generate short-term employment for those directly implementing the proposed 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 Mill Creek are consistent with the analysis in Section 3.3.14 of the Programmatic EA ("*Effects to Resources by Resource Type – Climate Change*"), which describes low impacts to climate change.

Due to the short duration of construction activities and the 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 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 *Mill Creek Passage Restoration at Gose Street 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 the National Environmental Policy Act (NEPA), DOE Implementing Procedures (dated June 30, 2025), and 40 CFR § 1502.9.[1] Therefore, no further NEPA analysis or documentation is required.

[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 NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq*.

JACQUELYN SCHEI

Digitally signed by JACQUELYN SCHEI
Date: 2025.10.07 06:53:36 -07'00'

Jacquelyn Schei
Environmental Protection Specialist

Concur:

KATEY GRANGE

Digitally signed by KATEY GRANGE
Date: 2025.10.09 08:13:01 -07'00'

Katey Grange
NEPA Compliance Office