Supplement Analysis
for the
Columbia River Basin Tributary Habitat Restoration
Programmatic Environmental Assessment
(DOE/EA/EIS-2126/SA-81)

5-year Reevaluation

Bonneville Power Administration
Department of Energy

Introduction

In December 2020, Bonneville Power Administration (Bonneville) 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 effects of implementing habitat restoration actions in the Columbia River Basin and its tributaries (Tributary Habitat Restoration Program). Since the release of the Programmatic EA in 2020, there have been 80 supplement analyses (SAs) that tiered to the Programmatic EA.

Under National Environmental Policy Act (NEPA), as amended, and DOE's NEPA Implementing Procedures (dated June 30, 2025), a programmatic environmental document may be relied upon for five years if there are no substantial new circumstances or information about the significance of adverse effects that bear on the analysis. After five years, the agency must reevaluate the programmatic analysis and underlying assumptions to ensure continued validity before relying on it in subsequent NEPA documents.

This SA serves as BPA's 5-year reevaluation (Reevaluation) under NEPA, as amended and DOE's NEPA Implementing Procedures to determine whether there have been substantial changes to the Tributary Habitat Restoration Program since completion of the Programmatic EA. The SA evaluates whether the potential environmental effects of typical actions and projects present new or different adverse effects that were not addressed by the analysis within the Programmatic EA or if new circumstances or information relevant to environmental concerns would further bear upon the validity of the original analysis. It also considers whether any modifications to the Columbia River Basin Tributary Habitat Program to 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.*) fall outside the scope of analysis within the Programmatic EA. The findings of this Reevaluation will determine if the analysis in the Programmatic EA and any underlying assumptions remains valid considering any new and substantial information or circumstances.

Proposed Activities

The ongoing Tributary Habitat Restoration Program, implemented by Bonneville, involves activities and projects to restore tributary habitat for fish and wildlife within the Columbia River Basin (excluding the Columbia River estuary) in the states of Oregon, Washington, Idaho, western Montana, and northern Nevada. As part of the Tributary Habitat Restoration Program, Bonneville continues to fund projects that restore instream habitat complexity, reconnect floodplains, improve riparian function, and remove fish passage barriers—consistent with the scope evaluated in the Programmatic EA. More specifically, as described in Section 2.1 of the Programmatic EA and the 2023 SA (SA-34), the categories of actions evaluated to achieve this purpose include:

1. Reestablishing and Improving Fish Passage
2. Improving River, Stream, Floodplain, and Wetland Habitat
3. Invasive Plant Control and Vegetation Management
4. Piling Removal
5. Road and Trail Erosion Control, Maintenance, Decommissioning, and Construction
6. In-Channel Nutrient Enhancement
7. Irrigation, Water Delivery, and Water Use Actions
8. Fish, Hydrologic, Wildlife, and Geomorphic Surveys
9. Riparian and Upland Habitat Improvements and Structures
10. Artificial Pond Development and Operation
11. Island Creation and Expansion

Ongoing and planned tributary actions remain within the same categories and scale evaluated in the Programmatic EA. While contemplated in the Programmatic EA, several restoration methodologies have been further developed and are proposed more frequently than in 2020:

- *Stage Zero restoration*: techniques that remove or regrade confined valley bottoms to reset incised streams to pre-channelized conditions, restoring floodplain connectivity and multi-thread channels; and
- *Low-tech restoration techniques*: use of hand-built or minimally mechanized structures such as post-assisted log structures (PALS) and beaver dam analogues (BDAs) to mimic natural processes and promote habitat complexity.

These methods are consistent with restoring natural processes to benefit Endangered Species Act (ESA)-listed salmonids and their habitats and are identified in Section 2.1.2.6 and Section 2.1.2.4.2 of the Programmatic EA, respectively. The frequency and scope of implementation for all other actions remain similar to 2020.

Reevaluation

The Programmatic EA evaluated the potential environmental effects of typical actions and projects of the Tributary Habitat Restoration Program, as well as of the Proposed Action and the No Action Alternative. In the past five years, Bonneville has completed more than 80 site-specific analyses for restoration actions in the Columbia River Basin and found all to be within the scope of actions proposed in the Programmatic EA and corresponding analysis. The most common project types in these SAs involve improving river, stream, floodplain, and wetland habitats, as well as riparian and upland habitat improvements. Specific restoration actions frequently include placing large wood habitat structures; excavating side channels; removing berms to increase floodplain connectivity; augmenting gravel; and implementing native plantings and seeding. Projects also include reestablishing and improving fish passage, such as replacing culverts with bridges or engineered riffles.

In general, implementation of these restoration actions and projects would have short-term adverse effects and long-term beneficial effects. Short-term impacts include temporary soil disturbance, vegetation damage, noise, vehicle emissions, and temporary displacement or stress to fish and wildlife due to construction activities and the use of heavy equipment. These temporary adverse effects are typically deemed low to moderate due to their short duration, localized nature, and the implementation of best management practices (BMPs). These short-term negative effects are countered by the long-term beneficial effects associated with restored and improved fish and wildlife habitat. The Programmatic EA analyzed whether the actions, projects, or alternatives could cause significant environmental effects (see Chapter 3 of the Programmatic EA and Finding of No Significant Impact). Subsequent site-specific project analysis in the SAs was consistent with the Programmatic EA, and no proposed project required preparation of an Environmental Impact Statement.

Further, all of these projects completed site-specific ESA and National Historic Preservation Act (NHPA) consultations with applicable permitting. Consultation with relevant agencies and consulting parties (e.g., National Marine Fisheries Service, US Fish and Wildlife Service, State Historic Preservation Offices, and Tribal Historic Preservation Offices) is a critical part of project planning and implementation to ensure compliance with environmental regulations and minimize impacts to ESA-listed species and cultural resources. Nearly all projects completed ESA consultation under Bonneville's Habitat Improvement Program (HIP4) programmatic Section 7 ESA consultation.

Conservation measures and monitoring are consistently applied across these projects. These include isolating work areas; salvaging and relocating fish and aquatic species; implementing BMPs for erosion and sediment control (such as temporary cofferdams, silt curtains, silt fences, straw wattles, and hydroseeding); protecting existing vegetation; minimizing disturbed areas; and revegetating completed project sites with native plants. Adaptive management is also noted for some projects, allowing for adjustments over time to achieve desired habitat values. Monitoring and lessons learned have not identified new action categories, additional effects, or effects greater in intensity than analyzed in the Programmatic EA. Thus, this reevaluation finds it is still valid to rely on the Programmatic EA based on the Programmatic EA's analysis and underlying assumptions as well as the subsequent SAs, including the analysis, mitigation measures, monitoring and lessons learned.

Findings

In this Reevaluation, BPA determined that the scope and nature of the actions and their potential impacts associated with the Tributary Habitat Restoration Program are ongoing and remain consistent to those analyzed in the Programmatic EA and Finding of No Significant Impact.

As per DOE NEPA Implementing Procedures and consistent with Section 108 of NEPA, and 40 CFR 1501.11(c)[1], DOE may rely on a programmatic EA for 5 years in the absence of substantial new circumstances or information indicating significant adverse effects that bear on the analysis. BPA has reevaluated the analysis and underlying assumptions in the Programmatic EA to ensure continued reliance is valid. This reevaluation confirms that there have been no substantive modifications to the Programmatic EA's Proposed Action relevant to environmental concerns. There are also no new circumstances or information that would alter the significance of the adverse effects that bear on the analysis within the context of NEPA and the DOE NEPA Implementing Procedures. Therefore, no further

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

NEPA analysis or documentation beyond the existing Programmatic EA is required; BPA may continue to rely on the Programmatic EA for subsequent tiered, site-specific NEPA reviews.

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