

**Supplement Analysis**  
for the  
**Clark Fork Delta Restoration Project**  
(DOE/EA-1969 SA-01)

**Phase I Updates to Clark Fork Delta Restoration Project**  
**BPA project number 1992-061-03**

Bonneville Power Administration  
Department of Energy



**Background**

In July 2014, Bonneville Power Administration (BPA) completed the Clark Fork Delta Restoration Environmental Assessment (EA) (DOE/EA-1969) and Finding of No Significant Impact (FONSI). The EA analyzed the potential impacts of wetland and riparian habitat restoration work at the Clark Fork River Delta located at the confluence of the Clark Fork River and Lake Pend Oreille in Bonner County, Idaho.

In 2014, Idaho Department of Fish and Game (IDFG) began implementation of Phase I of the Proposed Action (referred to as the first and second construction stages described in EA *Section 2.1.4 Construction Sequencing*). Due to budget and timing limitations of the project, only a portion of the work in Areas 3/4/9 and 7 was completed during the 2014-2015 construction season (roughly August through April), and minor access road work was completed in Area 11. Additional BPA funding is available to continue Phase I work in Areas 3/4/9, 7, and 11. However, changing shoreline conditions at the Delta since 2014-2015 implementation, and lessons learned from work constructed to date, necessitate updates to elements of Phase I work described in the Proposed Action of the EA.

This supplement analysis (SA) analyzes proposed updates to the Phase I project work that was partially completed in 2014 and 2015. The purpose of this SA is to determine if the updates to the Phase 1 project work are considered a significant new circumstance, or information relevant to environmental concerns that were not addressed by the EA, such that either would warrant the need for a supplemental EA.

**Description of Changes to the Proposed Action**

Project construction techniques and Best Management Practices (BMPs) would be the same as those described in the EA *Section 2.1.2 Project Elements and Construction Actions*, with some updates to work conducted in the project area, as well as updates to restoration techniques and construction actions proposed. These actions would support conservation of Endangered Species Act (ESA)-listed species considered in the 2020 ESA consultations with US Fish and Wildlife Service (USFWS) on the operation and maintenance of the Columbia River System.

**Updates by Project Area**

**Area 3/4/9 (US Army Corps of Engineers [ACOE] owned, IDFG managed)**

Updated Phase I project work would include re-establishment of most of the access roads constructed in 2014. Those access road surfaces were graded and re-planted in 2014, but soil depths remain shallow and road-like features are still present on the landscape. After construction, roads would either be buried in place to become part of constructed breakwater features, or would be removed, graded, and

restored with native vegetation using techniques described in the EA (*Chapter 2 Proposed Action and Alternatives, Section 2.1.2.2 Construction Actions*). Up to two feet of additional silts would be placed along previously-constructed breakwaters to improve substrate and promote riparian growth. Substrate used as fill would come from on-site borrow areas.

Raised island areas would be constructed on the lee side of the Area 3 breakwater constructed in 2014/2015. However, due to high material transportation costs, the area with increased ground elevation treatments would be about 10 acres instead of the 42 acres that remain from the 2014 project design.

Area 7 (US Bureau of Land Management [BLM] owned)

Similar to updated work in Area 3/4/9, Area 7 work would include re-establishment of about 2,000 linear feet of temporary access roads in addition to the access roads proposed in the EA that were not constructed in 2014/2015. After construction, roads would either be buried in place to become part of constructed breakwater features, or would be removed, graded, and restored with native vegetation using techniques described in the EA (*Chapter 2 Proposed Action and Alternatives, Section 2.1.2.2 Construction Actions*).

The EA proposed raising 52.8 acres of ground elevation in Area 7 by about 3 feet. Due to budget constraints around importing suitable fill material to the site, updates to Phase I work would reduce the quantity of area with increased ground elevation to about 47 acres. About 1,500 linear feet of expanded bank and slope protection would be developed on the north and east edges of Area 7 where new soil sloughing has been observed post-2014, and about 25,000 more willow plantings would be used in those areas.

Area 11 (ACOE owned, IDFG co-managed)

Updated Area 11 project work would include about one mile of re-established temporary access roads, in addition to temporary access roads proposed in the EA. After construction, roads would either be buried in place to become part of constructed breakwater features, or would be removed, graded, and restored with native vegetation using techniques described in the EA (*Chapter 2 Proposed Action and Alternatives, Section 2.1.2.2 Construction Actions*).

The EA proposed raising about 29.2 acres of ground elevation in Area 11 by 1.5 feet. Due to budget constraints around importing suitable fill material to the site, updates to Phase I work would reduce the quantity of area with increased ground elevation to about 12.3 acres. About 1,000 feet of additional bank protection would be installed on the north end of the existing ACOE log boom to the toe of Highway 200. The additional breakwater would provide inland protection of proposed island areas and would allow for full-pool log yard maintenance access by ACOE. Additional island building work (up to the originally consulted 42 acres) could occur in subsequent years as funding is available.

**Staging Area Expansion in Area 11**

In addition to staging areas described in the EA, the Area 11 temporary staging area at the boat ramp parking lot would be expanded up to 6 acres west to accommodate additional rock storage needs. After construction, the expanded site would be returned to pre-construction conditions or better, including grading, planting, and seeding (see Final EA *Chapter 2 Proposed Action and Alternatives, Section 2.1.2.2 Construction Actions*).

### **Additional Bridge Crossing Options between Areas 7 and 11**

EA *Section 2.1.2.2 Construction Actions* described the use of a temporary floating bridge with pilings to provide access between Areas 7 and 11 during project construction. During 2014-2015 Phase I implementation, the floating bridge technique was used to access both areas. However, due to the cost of specialty bridge components and the flow fluctuations during an unexpected spring flood event during 2014/2015 construction, two additional crossing options are proposed to provide flexibility to construction contractors:

- **Bridge option 1** would utilize in-channel temporary pilings to anchor a temporary bridge between Areas 7 and 11. These pilings or “spuds” would be driven into the channel bed at appropriate distances to help secure and stabilize floating bridge/barge sections against the channel current and transiting equipment.
- **Bridge option 2** would include installation of in-water footings on each bank to support a shorter single-span bridge. Temporary footings would be constructed by installing sheet pilings in-stream, then backfilling piles with native fill. The in-stream footings would support a single clear span bridge to provide stable access between Areas 7 and 11. Post-construction, all sheet pilings and fill would be removed and banks would be re-contoured and seeded.

Work area isolation measures described in the EA, such as the use of bubble curtains and wood blocks, or use of a vibratory hammer would minimize vibration and noise disturbance during installation and removal of pilings or footings. Both crossing options would maintain existing stream flows to maintain fish passage. After construction, all footings, pilings, and fill material would be removed and banks would be reshaped and seeded.

### **Use of Synthetic Riprap in Area 11**

In addition to vegetated riprap (described in EA *Section 2.1.2.1 Restoration Elements - Bank Armor and Protection*), IDFG proposes to use up to 800 linear feet of synthetic geotextile material along banks adjacent to the existing public boat ramp in Area 11. Banks would be shaped using an excavator and the specialized fabric would be installed by hand and anchored using an earth anchor plus steel cable system. After installation, native grasses, sedges, and trees would be planted between the geotextile matrix using on-site silts or clean topsoil as a growth medium. The fabric would provide long-term, UV stable bank erosion protection.

### **Boat Ramp and Dock Extension in Area 11**

Additional boat ramp infrastructure proposed at the Area 11 Driftyard would be installed to support IDFG and ACOE management activities and reduce recreational congestion. IDFG uses the existing boat ramp as the main access to the Delta. The boat ramp is undersized and above the water line during low pool periods. Increased recreational use of the ramp has increased on-site hazards such as stuck trailers, damaged boats, and increased turbidity at low pool. The EA proposed bank re-sloping and armoring west of the existing ramp. For the Phase I update, that area would instead be used for a new concrete cast-in-place 20-foot-wide by 144-foot-long parallel boat ramp, the last 35 feet of which would be a “push in place” section to be used during low pool periods. The existing boat dock between the existing and proposed boat ramp would be extended up to 30 feet to improve utility. Two permanent 8-inch-diameter steel piles would be driven, one each to stabilize the existing dock and additional dock length.

### **Addition of Area 2 and 3/4/9 Vegetated Riprap and Gravel Bar Extraction**

Additional vegetated riprap is proposed along the western banks of Area 2 and eastern banks of Area 3/4/9 to address substantial bank erosion that has occurred post-2014. IDFG proposes to add up to 2,400 linear feet of vegetated riprap along the western banks of Area 2 and about 730 linear feet on the eastern banks of Area 3/4/9 to halt further erosion. Vegetated riprap and riparian plantings would be

installed using the same techniques described in the EA *Section 2.1.2 Project Elements and Construction Actions*.

There is a sizeable gravel bar that has accumulated between Areas 3/4/9 and Area 2 that is forcing flows towards Area 3/4/9 and 2 banks. Targeted excavation of about 8.5 acres of the mid-channel gravel bar would further reduce erosive forces along the banks in those areas. The remaining gravel bar would be shaped to keep flows towards the center of the channel. Excavated rock from the gravel bar would be used throughout the project area as gravel cobble. Gravel bar removal would occur during low flows to minimize in-water work. During low lake levels, the area is comprised of multiple braided channels that fluctuate depending on Cabinet Gorge dam operations and localized tributary inputs. Equipment crossings within the wetted channel would utilize a cofferdam, floating silt curtains, and culverted drainage crossings to maintain flow stability and to access the gravel bar to extract materials (see EA *Section 2.1.2.2 Construction Actions*).

#### **Update to Material Types, Quantities, and Borrow Areas**

Some modifications to material types and quantities are summarized below in Table 1. Updated Phase I work represents a reduction in the use of native earth fill proposed for all three areas, but an increase in the amount of gravel cobble, riprap, willow plantings, and geotextile fabric used to implement the Phase I updates. Changes in material quantities are to support modifications to Area 7 breakwater design and the need to expand bank armoring and protection measures to Area 2 and 3/4/9 due to continued erosive losses post-2014.

Reduction in the use of earth fill and increase in gravel cobble reflects lessons learned about on-site material limitations for building emergent structures (Table 1 footnotes). Borrow areas for gravel cobble have been identified in Area 3/4/9, 7, and in the gravel bar between Area 3/4/9 and 2. In 2014, the Final EA described the potential for heavy metal contamination in Area 3/4/9, and in one location of Area 7. The Final EA indicated that contaminated borrow areas would be avoided with buffers extending to adjacent non-contaminated sample locations (see *Table 2-2 Environmental Design Feature/Mitigation Measures Included as Part of the Project*). For the Phase 1 project update, IDFG has indicated a potential need to use borrow areas that contain contaminants that exceed *Sediment Evaluation Framework (SEF) for the Pacific Northwest* freshwater Screening Level (SL) 1 concentrations but that are below SL-2 thresholds (RSET, 2018). The Final EA *Chapter 3.4 Water Resources, Affected Environment, Section 3.4.1.2 Water Quality* discussed the SEF and known exceedances based on the 2006 Interim Final SEF. The document was finalized in May 2018 with no changes to screening level concentrations.

**Table 1** Change in estimated material quantities between 2014 Phase I and proposed Phase I update

Items	Units	Phase I 2014			Phase I 2015			Phase I Update			Total (As-Built + Phase I Update)		
		Estimated Material Quantities			As-Built Quantities Used			Estimated New Quantities					
		Area 3/4/9	Area 7	Area 11	Area 3/4/9	Area 7	Area 11	Area 3/4/9 & Area 2	Area 7	Area 11	Area 3/4/9 & Area 2	Area 7	Area 11
Earth Fill <sup>1</sup>	CY	526,570	271,680	148,480	43,260 <sup>3</sup>	0	0	44,249	45,477	12,232	87,509	45,477	12,232
Riprap	TN	48,720	33,850	7,520	50,063	3,000	0	48,185	55,960	14,869	98,248	58,960	14,869
Gravel cobble <sup>1</sup>	TN	0	0	0	173,122 <sup>3</sup>	0	0	83,390	94,904	21,469	256,512	94,904	21,469
Filter/overtop gravel	TN	9,690	3,880	1,200	9,685	0	0	0	0	0	9,685	0	0
Trees w/ Rootwads	EA	333	121	0	333	0	0	0	0	0	333	0	0
Willow poles and whips <sup>2</sup>	EA	51,305	29,760	24,040	41,349	0	0	44,244	48,492	9,660	85,593	48,492	9,660
Concrete ecoblocks	EA	126	85	4	2	0	0	0	0	0	2	0	0
Geotextile	SY	5,170	5,160	0	0	0	0	0	13,211	3,572	0	13,211	3,572

<sup>1</sup> Earth fill refers to on-site silt and gravel cobble extracted from the project area and used as fill throughout the proposed project. In Phase I, project proponents assumed native silts could stabilize island areas. However, the silts could not consolidate and maintain appropriate shape and stability. For the Phase I update, pit run from offsite sources and native gravel cobble would be used as a substitute.

<sup>2</sup> Willow poles and willow posts are distinguished by size (posts are thicker, whips are thinner). The 2014 EA separated the two types in Table 2-1. Installation techniques would result in similar impacts.

<sup>3</sup> Phase I Earth fill consulted quantities assumed fill would be primarily composed of silt, but about 80% of extracted materials were gravel cobble. Gravel cobble was used during 2014/2015 construction instead to ensure island stability during construction.

CY=Cubic Yards

TN=Tons

EA=Each

SY=Square Yards

## **Analysis**

Updates to Phase I work at Clark Fork Delta Restoration Project would be of similar scale and essentially the same as described in the Final EA. The Final EA analyzed impacts of the project, including temporary staging, access roads and stream crossings, installation of shoreline protection measures, native plantings, and ongoing site management. Proposed design changes in each project area would be of similar scale and would occur during the annual lake drawdown period between October and April. Construction mobilization and staging would start in September.

On March 22, 2021, BPA re-initiated cultural resources consultation with project consulting parties to provide updates to the Proposed Action and to initiate consultation for new project work proposed in this Phase I project update. Additional cultural resources inventory was conducted to focus on areas that were not previously inventoried, including the Area 2 shoreline where bank protection measures are proposed, and at the gravel bar between Area 3/4/9 and 2 where gravel extraction is proposed. No new historic properties were identified. On June 1, 2021, BPA made a determination of *no adverse effect to historic properties*, and re-affirmed project minimization and avoidance measures that were identified in the original 2014 consultation and described in the Final EA (see *Table 2-2 Environmental Design Features/Mitigation Measures Included as Part of the Project*). Idaho State Historic Preservation Office concurred on June 21, 2021 and no further comments were received from consulting parties. Impacts to cultural resource would be the same as those described in *Chapter 3.7 Cultural Resources, Section 3.7.3 Environmental Consequences*.

On July 1, 2021, and again on August 6, 2021, BPA updated US Fish and Wildlife Service (USFWS) on changes to the Phase I project work since conducting informal consultation in 2014 (USFWS consultation number 01EIFW00-2014-I-0189). USFWS concluded that re-initiation of consultation is not necessary because updates to the Proposed Action would not result in effects that were not previously analyzed, and no new species have been listed in the project area since the 2014 consultation (USFWS updated consultation numbers: 01EIFW00-2021-E-03786 and 01EIFW00-2021-E-04205). Avoidance and minimization measures to protect bull trout and bull trout critical habitat would be the same as those described in the Final EA, *Table 2-2 Environmental Design Features/Mitigation Measures Included as Part of the Project*. Impacts to bull trout and bull trout critical habitat would be the same as described in the Final EA, *Chapter 3.5 Fish and Wildlife, Section 3.7.3 Environmental Consequences*.

On September 3, 2021, ACOE issued IDFG a Clean Water Act (CWA) Section 404 Nationwide Permit (NWP) 27 Aquatic Habitat Restoration and NWP 33 Temporary Construction Access and Dewatering (NWP-2021-00361). IDFG would adhere to all applicable avoidance and minimization measures outlined in the CWA permit for the project. The Phase I project updates would result in short term low impact to wetlands and vegetation during construction. Long-term, no net loss of wetland functions or values is expected (Final EA *Chapter 3.3 Vegetation and Wetland, Section 3.3.2 Environmental Consequences*).

### **Staging Areas Expansion in Area 11**

Ground preparation activities for the expanded Area 11 staging area would be the same as ground preparation activities described in the Final EA *Section 2.1.2.2 Construction Actions*. Impacts associated with the ground preparation of the staging site would include permanently crushed and killed vegetation, temporary soil compaction and increased erosion from sheet flow over a flattened surface. Construction impacts would be temporary and minor because mitigation measures such as the use of sediment control measures, creation of a Stormwater Pollution Prevention Plan, limits to on-site refueling and equipment staging, and vegetation re-establishment would be applied to actions taken to prepare, use, and decommission the additional staging area (*Table 2-2 Environmental Design*

*Features/Mitigation Measures Included as Part of the Project*). Expansion of the Area 11 staging area would be consistent with the impacts considered in the Final EA.

#### **Additional Bridge Crossing Options between Areas 7 and 11**

Temporary access options between Areas 11 and 7 would employ use of construction techniques similar to those described in the Final EA. Pilings and sheet piles to support bridge crossing infrastructure options would be installed using similar techniques as pier-anchoring activities described for the temporary floating bridge (*Section 2.1.2.2 Construction Actions*). Short-term disruption to deepwater algal beds disturbed during pile placement would be the same as described in the Final EA. Algal beds are expected to recover within one to two growing seasons (*Chapter 3.3 Vegetation and Wetlands, Environmental Consequences, Section 3.3.2.1 Erosion Control and Restoration Measures*). Short-term impacts to fish and other freshwater species could alter behavior and result in injury or mortality during pile installation. Impacts would be similar to those described in *Chapter 3.5 Fish and Wildlife, Section 3.5.2 Environmental Consequences*. Implementation of mitigation measures such as the use of a bubble curtain and wood blocks or vibratory hammers would minimize those temporary underwater noise effects (*Table 2-2 Environmental Design Features/Mitigation Measures Included as Part of the Project*). Both crossings would be removed and banks would be re-shaped and seeded post-construction. No long-term impacts are expected and the impacts from the additional bridge options would be consistent with those described in the Final EA.

#### **Use of Synthetic Rip Rap in Area 11**

In lieu of vegetated riprap with rock protection as a primary substrate for bank armoring, IDFG proposes to use synthetic fabric backfilled with vegetation along an 800-foot-long section of Area 11. Use of synthetic riprap would provide a stable surface that could allow for recreational access to the shoreline where riprap could not. Short-term erosion from bank shaping would be less than the impacts expected from site preparation for bank armoring, but with no heavy equipment needed to install the synthetic support fabric. Long-term protection from ongoing erosion along the Area 11 shoreline would be similar to what is described in *Chapter 3.2 Geology and Soils, Environmental Consequences, Section 3.2.2.1 Erosion Control and Restoration Measures*). Synthetic riprap is a non-toxic, long-term UV stable material that would provide long-term increase in recreational enjoyment and improved land use access along the streambanks, similar to what is described in the Final EA, *Chapter 3.4 Land Use and Recreation, Section 3.6.2 Environmental Consequences*.

#### **Boat Ramp and Dock Extension in Area 11**

Installation of a new boat ramp west of the existing boat ramp in Area 11, and 30-foot-long dock extension, would improve IDFG and ACOE management access to the lake and Delta island areas during construction and in the long term. For the dock extension, two permanent 8-inch-diameter steel piles would be installed using similar techniques as described in the EA for pier-anchoring (*Section 2.1.2.2 Construction Actions*). Short-term impacts to freshwater algal beds, fish, and freshwater organisms would be the same as described in this analysis for bridge crossing options.

Long term, algal beds are expected to recover in one to two growing seasons, even with the negligible impact of permanent dock piles in place. The new boat ramp would allow for year-long stable boat access that would alleviate congestion, and limit the amount of sediment sloughing and turbidity that occurs at the existing undersized ramp each year during low pool periods. Long-term improved land use access and recreational enjoyment would be similar to what is described in the Final EA, *Chapter 3.4 Land Use and Recreation, Section 3.6.2 Environmental Consequences*.

### **Addition of Area 2 and 3/4/9 Vegetated Riprap and Gravel Bar Extraction**

A small portion of the southwest corner of the Area 2 proposed work is located on BLM-owned and managed property; the remainder is owned by IDFG. In the Final EA, *Table 4-2 Relevant Goals, Objectives, and Actions of BLMs Coeur d'Alene Resource Management Plan* (RMP) outlines goals and objectives of the RMP that align with the goals of the Project. IDFG is working with the BLM to obtain appropriate approvals for the additional project work in Area 2. BLM will prepare a separate Determination of NEPA Adequacy and issue a new Decision Record for updates to this project.

The shoreline of Area 2 is characterized by its simplified to non-existent riparian vegetative community. Short-term impacts from installation of temporary roads and stream crossings, bank sloping and reshaping, and construction of shoreline protection features could increase erosion and soil loss, decrease water quality with increased sedimentation and turbidity, and impact fish and other freshwater species. Mitigation measures such as work area isolation, the use of silt fencing, culverted stream crossings, and other additional measures identified in the Final EA, *Table 2-2 Environmental Design Features/Mitigation Measures Included as Part of the Project* would minimize those impacts.

Gravel bar extraction and reshaping would encourage a more naturally braided channel form between Area 3/4/9 and 2, and would further dissipate erosive forces along their banks. Long-term improvements to erosion protection, vegetation re-establishment, and improvement to water quality from reduced long-term erosion and sedimentation would improve Delta conditions.

Overall, the impacts associated with these added features would be consistent with those described throughout the Final EA Chapter 3 Environmental Consequences discussions for Erosion Control and Restoration Measures.

### **Updates to Material Types, Quantities, and Borrow Areas**

Changes to material types and quantities outlined in Table 1 represent a reduction in the overall scale of long and short-term impacts associated with island building for emergent benches and construction of breakwaters throughout the Clark Fork Delta. The decrease in use of native earth fill but increase in on-site gravel cobble is to address lessons learned during 2014/2015 construction when native silts could not appropriately consolidate to stabilize raised island and breakwater areas. Use of on-site gravel cobble would provide a more stable base and a combination of on- and off-site sources would be utilized to backfill raised areas with silt and clean topsoil suitable to support riparian vegetation plantings and management.

Increased quantities of vegetated riprap reflect the need for additional linear feet of and an increase in the depth of rock protection and bank armoring for areas where substantial erosion and soil sloughing has been observed since 2014. Additional bank protection and armoring measures would use the same construction techniques described in the Final EA *Chapter 2 Proposed Action and Alternatives* and would not change overall impacts described throughout *Chapter 3 Environmental Consequences* discussions for Erosion Control and Restoration Measures.

Proposed new borrow areas in Area 3/4/9, 7 and at the gravel bar between Areas 3/4/9 and 2 were sampled using preliminary X-Ray Fluorescence (XRF) sampling techniques to determine if additional analysis or restrictions would be needed, similar to the Final EA (see *Section 3.4.1.2 Water Quality*). XRF sampling indicated the potential for increased levels of arsenic, cadmium, and copper that may be in exceedance of freshwater benthic invertebrate screening levels (SL) and/or represent a possible human exposure risk, according to Idaho Department of Environmental Quality (IDEQ).



In 2014, the Sediment Assessment recommended that either borrow areas be limited to areas where metals were not detected at concentrations greater than SL-1, or that metals-impacted sediments in exceedance of SL-1 thresholds but below SL-2 thresholds could be located to areas that would minimize exposure risk (such as in raised island areas and breakwaters) and be covered with a cap of non-contaminated sediments. The Final EA indicated that contaminated borrow areas would be avoided with buffers extending to adjacent non-contaminated sample locations (see *Table 2-2 Environmental Design Feature/Mitigation Measures Included as Part of the Project*).

For the Phase 1 project update, IDFG may use borrow areas that contain contaminants that exceed SL-1 contaminations, but are below SL-2 thresholds, provided their use would not result in increased risk of exposure to water resources, or increased risk of human health exposure potential based on Environmental Protection Agency risk values for recreational users. Prior to use of untested borrow areas, IDFG would work with a qualified contractor to prepare an update to the 2014 Sediment Assessment. A Sampling Analysis Plan, Quality Assurance Plan, and site-specific Health and Safety Plan would be submitted to IDEQ for review and approval prior to sampling. Up to 100 sediment samples would be analyzed for contamination. The updated sediment assessment would provide recommendations for using sediments as borrow material or capping it in-place. IDFG would obtain all necessary approvals from IDEQ to conduct on-site borrow work in areas with known contaminants, including a Clean Water Act National Pollutant Discharge Elimination System Permit, and adherence to applicable surface water quality standards. IDEQ review and approval of the sediment analysis and recommended on-site use of borrow materials would ensure any hazardous wastes be disposed of according to applicable federal and state laws. Overall, the plans would be approved by IDEQ and would include extensive sampling, capping of contaminants, and adherence to applicable surface water quality standards would result in a very low likelihood of contaminants that would exceed water or human health exposure values from travelling off site or reaching public users. As such, the impacts from using onsite borrow areas that are below SL-2 thresholds would result in similar effects and would be consistent with the EA.

### **Findings**

BPA finds that the updates to the Phase I proposed actions and potential impacts related to the Clark Fork Delta Restoration Project Phase I Updates are similar to those analyzed in the Clark Fork Delta Restoration Project Final EA (DOE/EA-1969, June 2014). There are no substantial changes in the proposed action and no significant new circumstances or information relevant to environmental concerns bearing on the proposed action or its impacts within the meaning of 10 CFR § 1021.314(c)(1) and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

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Concur:

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## References Cited

Northwest Regional Sediment Evaluation Team (RSET). 2018. *Sediment Evaluation Framework for the Pacific Northwest*. Prepared by RSET Agencies, May 2018.