

# memorandum

DATE: February 2, 2015

REPLY TO  
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for Mid-Columbia Coho Restoration Program Final EIS (DOE/EIS-0425-SA-5)

TO: Roy Beaty  
Project Manager - KEWU-4

**Proposed Action:** Mid-Columbia Coho Restoration Program, Acclimation Pond Modifications

**Project No.:** 1996-040-00

**Location:** Various locations in the Wenatchee and Methow River Basins; Okanogan and Chelan counties, Washington

**Proposed by:** Bonneville Power Administration (BPA)

**Introduction:** In 2012, BPA completed the Mid-Columbia Coho Restoration Program Final Environmental Impact Statement (EIS) (DOE/EIS-0425) and issued a Record of Decision documenting its decision to fund the Yakama Nation (YN) to implement the remaining phases of its comprehensive coho restoration program in the Wenatchee and Methow river basins. The program has been developing a locally adapted broodstock and establishing naturally reproducing, self-sustaining coho populations in multiple tributaries throughout the two basins since 1996. The action proposed in the EIS included a small new hatchery in the Wenatchee basin and 24 acclimation ponds in targeted tributaries in the two basins. Since the EIS was completed, the YN found that modifications were required at several acclimation facilities evaluated in the EIS in order for them to be fully functional for the program. These sites are known as: Beaver, Clear, Tall Timber, and White River Bridge (formerly named McComas) in the Wenatchee basin; and Lower Twisp, Upper Twisp (formerly named Lincoln), and Utley in the Methow basin.

This supplement analysis was prepared to determine if the proposed modifications at the seven sites represent substantial changes to the coho program considered in the EIS or are significant new circumstances or information that are relevant to environmental concerns and bear on the proposed action or its impacts. The findings of this supplement analysis determine whether a supplemental EIS is needed pursuant to 40 Code of Federal Regulations (CFR) § 1502.9(c).

The design and implementation of the coho program, including total coho production and release numbers in each basin, are the same as described in the 2012 Final EIS and Record of Decision and would not change as a result of the proposed modifications. The environmental effects of releases were evaluated in the 2012 Final EIS.

## Analysis:

### Wenatchee Basin Sites

**Beaver.** Beaver is a man-made pond 115 feet in diameter, occupying 0.24 acre adjacent to Beaver Creek, a tributary of the Wenatchee River. The site has been used for coho acclimation since 2002.

**Proposal in EIS:** Continue to acclimate up to 100,000 coho smolts in the pond. No construction.

**Current proposal:** Within 500 feet of the existing pond, there are two high-water channels and a channel that supplies the pond, all of which are branches of Beaver Creek. The stream sections at the pond-supply channel and at one of the high-water channels would be stabilized with rock. Existing steep drops in Beaver Creek that may be barriers to upstream fish migration would be modified with two roughened channels, each approximately 30 feet long and at an 8% slope, creating a more gradual gradient. A screen would be removed to allow anadromous fish passage as required by National Oceanic and Atmospheric Administration (NOAA) Fisheries (*Beaver Acclimation Site Project Description*, YN, 2/27/14).

**Effects:** The proposed modifications would not alter continuing site operations. Excavation of about 60 linear feet of stream channel and placement of large rocks (12 to 24 inches in diameter), gravel, and sand would modify approximately 1,050 square feet of streambed; the pond would not be excavated. The work in Beaver Creek to remove the screen structure and to construct the roughened channels would incorporate best management practices (e.g., coffer dams, fish salvage) similar to those discussed in the Final EIS and Record of Decision to protect water quality and fish.

Removing the screen structure and improving fish passage conditions would provide a benefit to Endangered Species Act (ESA) listed steelhead and bull trout in the long term by providing access to additional habitat. Other impacts (e.g., construction noise, potential sedimentation, and accidental releases of fuel, etc.) to steelhead and bull trout would be short-term and similar to those addressed in the EIS at other sites that require construction. ESA-listed spring Chinook would not be affected because they are not present in Beaver Creek. Impacts to other fish, such as mountain sucker, Pacific lamprey, and westslope cutthroat would also be similar to those analyzed in the EIS at other sites and include the potential for temporary sedimentation of habitat during construction or displacement from habitat during coho acclimation. Before starting any in-water work, YN biologists would snorkel the work area to move fish out of the area. Potential impacts to Pacific lamprey would be mitigated using methods described by U.S. Fish and Wildlife Service as cited in the EIS. Therefore, the proposed modifications are expected to have overall low impacts on fish.

About 100 square feet of riparian vegetation would be temporarily disturbed; the areas would be re-vegetated with similar species. Measures to ensure success of the re-vegetation would be followed as described for other sites in the EIS and in *Beaver Acclimation Pond: Riparian Habitat Restoration of Project Impacts Plan* (Grette Associates, 3/11/14). On-site surveys found no wetlands, plants listed under the Endangered Species Act (ESA), or habitat or plants on the Washington State Priority Habitat and Species lists (Technical Memorandum from Ryan Walker [Grette Associates] to Cory Kamphaus [YN], 8/6/14).

ESA-listed northern spotted owls and gray wolves are unlikely to be present at the site because of the low habitat quality. Any potential construction impacts to these species and other wildlife would be comparable to those addressed in the EIS at other sites. The modifications would not reduce the amount of wildlife habitat.

In a letter dated December 12, 2012, the State of Washington Department of Archaeology and Historic Preservation concurred with BPA's finding that no historic properties would be affected by the proposed modifications to the Beaver acclimation site. In addition, water quality and other effects would be the same as those identified in the EIS.

For these reasons, the proposed modifications do not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**Clear.** This site in the Chiwawa River subbasin, a tributary of the Wenatchee River, contains several existing ponds on property that also includes a private campground, small cabins, and mowed lawns.

**Proposal in EIS:** Use one of the ponds to acclimate 150,000 coho smolts for up to 7 months (November – May). No construction.

**Current proposal:** A different pond would be used to acclimate 250,000 coho smolts, an increase of 100,000 over the 150,000 proposed in the EIS for this site; however, the acclimation period would be reduced to two months (March – May). The larger pond would partially replace the acclimation in two new constructed ponds in the Chiwawa River subbasin that were proposed in the EIS and now cannot be developed: Chikamin (100,000 smolts) and Minnow (100,000 smolts). The pond proposed for use at the Clear site drains into Clear Creek, a tributary to the Chiwawa River. No construction is required.

**Effects:** Use of a pond at the Clear site was evaluated in the EIS. The original pond was 22,650 square feet, of which 10,450 square feet (0.24 acre or 46% of the pond) would have been enclosed by a seine net. The pond now proposed for use is 73,000 square feet, of which 30,000 square feet would be enclosed for acclimation, or 41%. Although the amount of area enclosed is larger than that evaluated in the EIS, the percentage of the pond that would be enclosed is smaller. The EIS found that the man-made ponds at this site make up nearly all the side-channel habitat in lower Clear Creek, but with the extensive network of ponds, beaver canals, side channels, and abandoned oxbows and other wetlands in the Chiwawa River watershed, there would be no significant adverse effect on steelhead or on critical habitat for steelhead and bull trout because of the amount of habitat available in the area. Although the amount of area enclosed is nearly three times larger than the original proposal, the amount of time other fish would be excluded is a third of the original proposal. Therefore, it is expected that the effect on steelhead, bull trout, and their habitat would be similar to that identified in the EIS.

Although the current proposal would acclimate 100,000 more smolts at Clear than was originally proposed in the EIS, the total number of smolts acclimated in the Chiwawa subbasin would be reduced from 350,000 to 250,000 because acclimation at Chickamin and Minnow would not be developed.

Clear is farther downstream than the two sites it partially replaces. Total Phosphorus (TP) load would increase from 0.080% to 1.1% of the existing TP load in the Chiwawa River (Memorandum from Pradeep Mugunthan [Anchor QEA] to Cory Kamphaus [YN], 10/15/14).

Moving a portion of the acclimation downstream to the Clear site would result in the TP loads entering the Chiwawa River closer to its mouth. Flows are highest in this section of the river; therefore, the acclimation-related TP loads would be more diluted than if they were released farther upstream, and their residence time in the Chiwawa would be shorter, thus reducing the potential for the TP to be assimilated in the river. The acclimation-related loads are approximately 1% of the background TP loads in the river, a small proportion relative to the natural variability in the river. Thus, increasing the number of fish acclimated at the Clear site would result in a negligible difference in water quality impacts from the low impacts predicted in the EIS (Mugunthan memo, 10/15/14).

Impacts on other resources (i.e., spotted owls and mule deer) would be the same as those identified in the EIS.

For these reasons, the use of a different pond than was evaluated in the EIS does not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**Tall Timber.** Tall Timber is located close to the confluence of the Napeequa and White rivers, tributaries to the Wenatchee River. It is at the site of a church camp that has been in operation for 50 years.

**Proposal in EIS:** Two new side-by-side surface water intakes and 350 feet of buried pipe to supply sufficient water to an existing unnamed slough to acclimate 110,000 coho.

**Current proposal:** Acclimate 50,000 coho confined behind a net in an upper section of a different unnamed slough about 1,200 feet east of the original location. Project staff would use nets to block off a 200-foot section of the existing slough in mid-March or April of each year and remove the nets in May or early June. The slough would receive additional water from a new well rather than from a surface water diversion in the Napeequa River. Water would be pumped from the well to an aerator, and then channeled to the slough in a new 30-foot-long open channel. Water and power lines would be 180 feet long. Backup generators in a 100-square-foot building would supply power to the well pump during line outages. A fish passage barrier would be removed from the slough downstream of the acclimation area.

**Effects:** Acclimating up to 50,000 smolts instead of 110,000 would result in lower TP discharges into the White River than those estimated in the EIS at Tall Timber, which were expected to have a low impact. With no surface water withdrawals, no new surface water right would be required. However, the proposed new well would require a new groundwater right and would need to produce 1.2 cubic feet per second (cfs). The site would not be used if the proposed well does not produce enough water and/or if a permit is not granted, and the production designated for Tall Timber would be transferred to White River Bridge. (See White River Bridge description below).

If the site is developed, the length of the water and power lines would be less than a third of what was proposed in the EIS (100 feet vs. 350 feet), but 30 feet of the disturbance would be permanent instead of temporary, because it would be an open channel instead of a buried pipe. Ground disturbance for the well, aerator, and generator building also would be permanent, so *permanent* ground disturbance would be more than for the original proposal (210 square feet vs. 150 square feet). However, the permanent impacts would be in previously disturbed grassy areas instead of on the bank of the Napeequa River. *Temporary* ground disturbance would be limited to approximately 680 square feet, of which 500 square feet would be in previously

disturbed grassy areas; the rest would be riparian vegetation. These areas would be replanted as described in the next paragraph. The EIS identified no suitable habitat for ESA-listed plants or Washington State plants on the Priority Habitat and Species list within three miles of the site.

A wetland delineation was performed in June and July 2014. The project area contains a 0.5-acre Category III wetland, as defined in a rating system developed by the Washington Department of Ecology. The system defines standards for four categories of wetlands based on their function, with the highest quality wetland being a Category I. The Category III wetland system at this site scores low for water quality function and hydrology and moderate habitat function. Category III wetlands have a 75-foot buffer according to Chelan County standards. The wetland itself would not be affected, but the approximately 680 square feet of temporarily disturbed vegetation is all in the buffer zone. These areas would be replanted with native vegetation such as red osier dogwood and mountain ash, as described in the EIS for other sites and in *Tall Timber Wetland Delineation Report and Mitigation Plan* (Grette Associates, August 2014); therefore, impacts to the buffer are expected to be low. The effect of inundating a wetland/slough during acclimation was identified in the EIS and considered to be a low impact because the inundation would occur during the normal high-water period.

In-water construction would be limited to breaching the connection between the new water supply channel and the existing slough; construction below ordinary high water would disturb approximately 40 square feet, roughly 110 square feet less than the original proposal. Best management practices as documented in the EIS to prevent erosion and sedimentation would be used (e.g., filter fabric fences, no work during high water).

With no surface water withdrawals, there would be no habitat effects on fish in the Napeequa River. (In the EIS, a small decrease in habitat was expected during low river flows, and a small increase during high flows.) The netted acclimation area would enclose 3,000 square feet of slough. No reduction in access to available habitat was expected for the original location; for the new location, it is expected that 3,000 square feet of currently accessible habitat would be excluded for the two-month acclimation period. However, this impact would be offset by the removal of the fish passage barrier from the lower slough, which would improve the access to the slough and increase the amount of time this habitat would be available to ESA-listed fish. Therefore, this is expected to be a low impact.

The EIS indicated that there could be a slight reduction in potential spotted owl habitat at Tall Timber because the site is within 1 mile of a management circle and contains suitable forest habitat. The current proposal would not remove trees or otherwise physically affect suitable spotted owl habitat or designated critical habitat. Impacts to other Washington State Priority Habitat and Species would be similar to those identified in the EIS.

The construction period would be reduced from 2 months estimated in the EIS to 15 days, resulting in less noise disturbance to owners, guests, and wildlife. Noise was expected to be a low impact in the EIS. The generators would be used only in the event of power line outages and would be enclosed in a building, so noise impacts from them would be short-term and low.

On-site surveys found no cultural resources. The Washington Department of Archaeology and Historic Preservation concurred with the finding of no effect in a letter dated August 4, 2014.

Although the amount of ground disturbance is greater than that estimated for the EIS, the area of permanent vegetation removal is small, and temporarily disturbed areas would be restored. Other impacts would be less than those identified in the EIS for the original site. As a result,

changes to the site construction and operation activities evaluated in the EIS do not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**White River Bridge (formerly McComas).** The land, which is owned by Grant County Public Utility District No. 2 (Grant PUD), borders the Little Wenatchee Road and the White River (a tributary to the Wenatchee River). McComas was identified as a backup site in the EIS.

**Proposal in EIS:** Acclimate up to 50,000 coho smolts at the site, if used. Because the site was to be developed by Grant PUD, only the effects of its use were evaluated in the EIS; effects of development were to have been evaluated in Grant PUD's permitting process with the State of Washington, including the Hydraulic Project Approval process.

**Current proposal:** Acclimate up to 30,000 (or 80,000, if Tall Timber cannot be developed) coho smolts annually, from mid-March through mid-June, in temporary tanks at the proposed site. Prior to acclimation each year, a river water pump system and steel rearing tanks would be placed along the shoreline of the White River, above the ordinary high water mark (OHWM). Depending on the number of coho acclimated, up to 30 aluminum tanks, approximately 4 feet by 5 feet by 20 feet, would be placed on wooden decks on the ground. Water would be pumped into the tanks and returned to the river 20 feet downstream of the pump intake. Coho pre-smolts would be trucked to the site; after the acclimation period, they would be released into the White River. The pump system and tanks would be removed each June.

Three floating water pumps would be used to deliver up to approximately 1.9 cfs of surface water to the acclimation units. Grant PUD's water right for this amount would be transferred to YN. The intake would be screened in accordance with Washington Department of Fish and Wildlife (WDFW) screen criteria (RCW 77.57). Flexible plastic hose would run across the surface of the ground from the pumps to the tanks, and rigid PVC pipe would run across the surface of the ground from the tanks back to the river. The discharge pipes would extend into a deep-water pool to prevent bank erosion. A portable, self-contained, diesel-powered generator would be stationed on site in the case of line power failure. A spill-containment receptacle would be deployed under the generator for the duration of its presence on site. Tank water-level indicators with alarms would be used to monitor water levels.

**Effects:** The EIS analysis for the McComas site found that the TP loads for acclimation of 50,000 smolts were expected to be less than one-tenth of a percent of the loads carried by White River, which was not expected to adversely affect water quality. However, the loads from the McComas site were not factored into the analysis of combined impacts to the White River subbasin because McComas was a backup site. A new analysis (Mugunthan memo, 10/15/14) evaluates both scenarios described above—30,000 or 80,000 smolts acclimated at White River Bridge. This analysis evaluated the effects of shifting part or all of the TP loads from the original Tall Timber site evaluated in the EIS to the White River Bridge site, which is located closer to the mouth of the White River. The primary effect of discharging acclimation water closer to the mouth is that much of these loads would be delivered to Lake Wenatchee with little or no assimilation in the White River. The analysis shows that nutrient load from discharge water at this site represents about 0.10 percent (for 20,000 smolts) or 0.18 percent (for 80,000 smolts) of the total TP load delivered to Lake Wenatchee over the acclimation period. These increases would be well within the natural variability of the background loads in these waters. Therefore, neither scenario is likely to adversely affect water quality in either the White River or the lake.

A Category II palustrine emergent and scrub-shrub wetland borders the project area. All proposed activities would be outside of the wetland, but within the wetland buffer (an area up to 200 feet wide around the wetland). Long- and short-term impacts to the wetland buffer would be avoided because the facilities would be temporary, there would be no fill or excavation within the buffer, and the existing roadway would be used to install, maintain, and remove the equipment (Grant PUD JARPA 2011-2016 White River Bridge Site 082713).

Because no excavation would be required, cultural resources would not be affected. The Washington Department of Archaeology and Historic Preservation concurred with this finding in a letter dated September 20, 2011.

FEMA maps show that the site is in a Zone A flood area (subject to inundation by a 1-percent-annual-chance flood event). Periodic floods would inundate the project area. The facilities would be designed to continue operation during these events. If flood elevations reach the bottom of the tanks, depending on the number of tanks in place, up to 3,000 square feet (0.07 acres) of surface area would be removed from flood storage capacity, a negligible impact because the floodplain is many hundreds of acres in size in this area.

Use of temporary acclimation equipment at this site was anticipated in Grant PUD's permit applications. Because YN's proposal does not differ substantively from Grant PUD's proposal, because any impacts are limited and short-term, and because the EIS evaluated impacts of use of the site, the modifications do not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

### **Methow Basin Sites**

**Lower Twisp.** The Lower Twisp site is owned by the Methow Salmon Recovery Foundation and includes several ponds used for steelhead acclimation and one pond used for coho acclimation for the Mid-Columbia Coho project. The site is adjacent to the Twisp River, a tributary of the Methow River, and is less than a mile from the center of the town of Twisp.

***Proposal in EIS:*** Acclimate up to 30,000 coho smolts in "Pond A" for up to 7 months (November – May). No construction was proposed for this 5,600-square-foot pond. The site was a primary site in the EIS.

***Current proposal:*** Acclimate up to 115,000 coho smolts in "Pond A" and 25,000 coho smolts in a portion of "Pond B." Approximately 8% of the 15,600 square-foot Pond B would be enclosed by a temporary net, which would allow acclimation of juvenile coho from March to May. No construction is proposed. Lower Twisp is proposed to be operated together with the Upper Twisp site (see next site description), because flows at Upper Twisp can be uncertain. Depending on flow conditions, some or all of the 110,000 smolts proposed for the Upper Twisp site could be acclimated at Lower Twisp. However, the total number of smolts acclimated at the Upper and Lower Twisp sites would be no more than 140,000 annually.

***Effects:*** Water quality effects would not change from the low impacts identified in the EIS (Mugunthan memo, 10/15/14). The water quality analysis in the EIS evaluated the effects of 30,000 smolts at Lower Twisp and 110,000 smolts at Upper Twisp. The current proposal is to acclimate a total of 140,000 smolts between the two sites. Acclimating more smolts at Lower Twisp in some years raises concerns that higher nutrient loads would be discharged closer to the mouth of the Methow River, which is 303(d)-listed under the Clean Water Act as impaired for temperature, and is categorized as a water of concern for pH and dissolved oxygen. However, the Final EIS (2012) concluded that nutrients from the proposed acclimation in the Twisp River

are unlikely to produce a measurable impact on the Methow River downstream of the discharge even if all loads from the Twisp River acclimation sites entered the Methow River in a bioavailable form. That conclusion still applies because the acclimation numbers in the Twisp River subbasin would not increase (Mugunthan memo, 10/15/14).

The EIS evaluated use of 100% of Pond A, which is 5,600 square feet. Pond B is 15,600 square feet, of which 1,240 square feet (8.2%) would be seined off. The EIS indicated that the impact on ESA-listed fish of excluding the entire area of Pond A would be low for a 7-month acclimation period. The additional 1,240 square feet of habitat excluded would still result in a low impact to ESA-listed fish due to the large amount of remaining available area in Pond B, the reduction in the acclimation period from approximately 7 months to 3 months, and the low numbers of fish observed during routine snorkel surveys (C. Kamphaus, YN, pers. comm., 12/15/14).

With the reduction in the acclimation period from 7 months to a maximum of 3 months, use of an existing well as proposed in the EIS is not needed. Other impacts (i.e., to wildlife and riparian vegetation) would be the same as identified in the EIS (low); therefore, the modifications do not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**Upper Twisp (formerly Lincoln).** This site contains existing ponds adjacent to the Twisp River, a tributary of the Methow River. A farm and residence are adjacent to the ponds. The property is subject to a conservation easement purchased by the Methow Conservancy.

**Proposal in EIS:** Acclimate up to 110,000 coho smolts in a portion of Pond 2 enclosed by a seine net.

**Current proposal:** Acclimate up to 110,000 coho smolts in a portion of another pond, Pond 1, enclosed by a seine net. The site would be operated together with Lower Twisp (see previous site discussion). No construction is proposed.

**Effects:** The area of Pond 1 to be enclosed is the same as that proposed for Pond 2 (7,840 square feet, or 0.18 acre). The number of smolts to be acclimated is the same as the number proposed in the EIS. These ponds are located immediately adjacent to one another and both drain into the Twisp River. Thus, use of Pond 2 would have the same water quality impacts and impacts of excluding ESA-listed fish from existing habitat as those identified in the EIS for Pond 1, which were expected to be low. Other operational impacts (i.e., to mule deer and riparian habitat) would be the same as identified in the EIS and low, so the current proposal does not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**Utley.** The site is on a 12-acre privately owned property adjacent to the Twisp River Road, about 9 miles west of Twisp. It contains a large pond fed by spring water adjacent to the Twisp River. A rural home is adjacent to the pond.

**Proposal in EIS:** Construct a new 3-foot wide, 80-foot-long channel as an outlet for the existing pond. The site was a backup site in the EIS, to acclimate up to 83,000 coho smolts, if needed.

**Current proposal:** In addition to the 3-foot wide, 80-foot long channel, a 10-inch diameter well would supply additional water to the pond. Water would be pumped through a new 55-foot underground pipeline from the well to a 4-foot diameter aerator, and then channeled to the pond in a new 35-foot rock-lined open channel. Backup generators would be placed in a new



100-square-foot building to supply power to the well pump during line outages. The site is still proposed as a backup site and would not be used unless another site in the Twisp watershed cannot be used. If used, it is expected that 50,000 coho smolts would be acclimated at the site (33,000 fewer than the number proposed in the Final EIS).

**Effects:** In addition to the 240 square feet of riparian forest that would be removed for the discharge channel that was proposed in the Final EIS, 620 square feet of mowed grassland would be permanently removed for the proposed new facilities, including the well and aerator, generator building, and water-supply channel into the pond. Another 1,095 square feet of grassland would be temporarily disturbed to construct the pipelines, well, and aerator; these areas would be replanted. No trees greater than 10 inches diameter at breast height would be removed. While the amount of disturbance is greater than what was predicted in the Final EIS, primarily due to the new facilities, the type of vegetation affected is not listed under the ESA or as a Washington State Priority Habitat.

In the Final EIS, the project was expected to remove 150 square feet of riverine wetland, but a later wetland delineation identified no riverine wetlands at the site. However, the wetland delineation revealed that the pond proposed for coho acclimation is part of a palustrine, forested, seasonally flooded wetland (*Utley Site - Wetland Delineation Report*, Grette Associates, October 2014). This wetland is classified as a Category I wetland—the highest quality wetland under the Washington Department of Ecology standards—due to the presence of aspen as a dominant species. It has an Okanogan County-specified buffer zone of 200 feet. Except for the small amount (roughly 9 square feet) of wetland removed from the pond margin to create the outlet channel, the proposed new facilities would avoid wetlands but would temporarily or permanently affect approximately 1,940 square feet of the wetland buffer as described above. The impact to wetlands is less than predicted in the EIS; the impact to the wetland buffer would be low, because the vegetation affected has already been disturbed by human development.

An on-site survey conducted in October 2014 found no evidence of use by ESA-listed species (northern spotted owl) or wildlife, habitat, or plants on the Washington State Priority Habitat and Species lists. The removal of mowed grassland would not adversely affect any wildlife that might be present.

Due to the current lack of surface water connection, it is unlikely that the ESA-listed species in the Twisp River—spring Chinook, steelhead, and bull trout—use the wetland system in the project area. Creation of the outlet channel likely would increase the amount of habitat available to these species.

Excavation of the new well would require a new groundwater right, the application for which is in process. A new water right would not be granted if the well would adversely affect holders of nearby water rights; therefore, a new well would have low impacts on groundwater quality and supply and on flood storage capacity, similar to those identified for other sites in the EIS. The other proposed new facilities are similar to facilities proposed at other sites evaluated in the EIS, which were not expected to adversely affect floodplain storage, water quality, or wildlife. Noise effects on wildlife and on the nearby residence from the backup generators would be low and similar to impacts identified in the EIS at other sites with backup generators, because they would be used only as needed during line outages and would be enclosed within a building. A survey of the new area that would be affected found no cultural resources; the Washington Department of Archaeology and Historic Preservation concurred with the finding of no effect in a letter dated August 4, 2014.

Water quality impacts of acclimating fewer smolts than under the original proposal would be less than those identified in the EIS (which were considered to be low), and would only occur if another Twisp site is unavailable. Thus, there would be no increase in TP or other pollutants in the Twisp and Methow river systems beyond what was identified in the EIS.

Thus, the proposed modifications do not represent a substantial change to the existing project or significant new circumstances or information relevant to environmental concerns.

**Findings:** This supplement analysis finds that the potential impacts from the seven acclimation sites proposed for modification have been examined, reviewed, and consulted upon and are similar to those analyzed in the Mid-Columbia Coho Restoration Program EIS (DOE/EIS-0425), Record of Decision, and related biological assessments. The proposed modifications would not be implemented until any additional ESA consultation, if needed, is completed.

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(c). Therefore, a supplemental EIS to the Mid-Columbia Coho Restoration Program EIS is not needed.

*/s/ Donald L. Rose*

Donald L. Rose  
Supervisory Environmental Protection Specialist – KEC-4

DATE: *February 2, 2015*

CONCUR:

*/s/ Katherine S. Pierce*

Katherine S. Pierce  
NEPA Compliance Officer – KEC-4

DATE: *February 3, 2015*

ecc:

Tom Scribner, Yakama Nation, [scrt@yakamafish-nsn.gov](mailto:scrt@yakamafish-nsn.gov)  
Cory Kamphaus, Yakama Nation, [kamc@yakamafish-nsn.gov](mailto:kamc@yakamafish-nsn.gov)  
Rick Alford, Yakama Nation, [alfr@yakamafish-nsn.gov](mailto:alfr@yakamafish-nsn.gov)  
Greg Ferguson, Sea Springs Co., [gghhff@icloud.com](mailto:gghhff@icloud.com)