



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

December 21, 2017

Mr. Dave Goodman, Environmental Specialist
Bonneville Power Administration – ECF-4
P.O. Box 3621
Portland, Oregon 97208-3621

Dear Mr. Goodman:

The U.S. Environmental Protection Agency has reviewed the October 2017 Bonneville Power Administration Final Environmental Impact Statement for the Melvin R. Sampson Hatchery Yakima Basin Coho Project (EPA Region 10 Project Number 15-0058-BPA/CEQ number 20170230). We have reviewed the Final EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act and want to highlight the Final EIS's responsiveness to our April 2017 comments on the Draft EIS.

Water quality

Thank you for the additional water quality information in the Final EIS. It is helpful that the water quality analysis includes new sub-sections on suspended solids, temperature, pH, dissolved oxygen and nutrients. These sub-sections include useful information, such as the annual waste production estimate for dissolved phosphorous in Table 3.5-7. Also, we note the Final EIS discloses the results of a new coordination effort between BPA and the Washington Department of Ecology surface water quality standards program in response to our comments on the Draft EIS.

We reiterate our recommendation to analyze quantitative impacts to the receiving water(s) from the proposed hatchery effluent discharge.¹ Such an analysis could range from simple dilution or screening level water quality calculations to more complex water quality modeling. We continue to recommend a receiving water analysis because the conclusion in the Final EIS's new nutrient sub-section that the project is "...not expected to cause impacts to dissolved oxygen downstream..."² does not appear to be based on any site-specific assessment of waste assimilative capacity in the receiving water(s), and because the receiving water(s) may be sensitive to any changes in water quality due to limited flow, use by a re-established coho run,³ and proximity to core summer salmonid habitat.⁴ The results of a site-specific receiving water impact assessment could give hatchery operators and permitting agencies higher confidence that downstream reductions of dissolved oxygen, or other nutrient-related eutrophication impacts (e.g., elevated ammonia, high pH, algal growth etc.), are not already occurring or are not likely to occur once operations have begun.

¹ See Final EIS Table 3.5-7 Annual Waste Production Estimate

² Final EIS, p. 3-76

³ See scoping letter dated January 4, 2016 submitted by Washington Department of Fish and Wildlife

⁴ Core summer salmonid habitat having lower temperature and higher dissolved oxygen water quality standards are depicted as occurring downstream of proposed outfall within Ecology's water quality atlas map here:

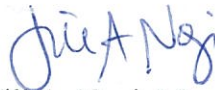
<https://fortress.wa.gov/ecy/waterqualityatlas/map.aspx> accessed on March 22, 2017.

Other responsive information in the Final EIS

- Section 1.4.4 is responsive to our recommendation that the EIS discuss how reforms, principles and standards from the Hatchery Scientific Review Group (HSRG) would be integrated into the proposed action. Discussing the integration of HSRG recommendations into this hatchery project proposal is helpful and appropriate because Congress established the Hatchery Reform Project (of which the HSRG is a part) out of recognition that the Pacific Northwest hatchery system needed comprehensive reform;
- Section 2.2.6 responds to our recommendation for an expanded description of the project's monitoring program. In addition to the added monitoring information, it is appropriate and useful to disclose in the EIS where annual monitoring reports are available for public review;⁵
- The additional text in Chapter 3 of the Final EIS clarifies the intent of impact levels used in the EIS, and we agree they are a useful tool for summarizing impacts for decision makers and the public; and,
- The response in Appendix A to our earlier comment on impacts to fish listed as threatened or endangered under the Endangered Species Act helpfully clarifies the difference between effects to the population as a whole versus effects at the individual level.

Thank you for this opportunity to comment. If you have any questions, please contact Erik Peterson, of my staff, at (206) 553-6382 or peterson.erik@epa.gov, or feel free to contact me at (206) 553-1841, or by email at nogi.jill@epa.gov.

Sincerely,



Jill A. Nogi, Manager
Environmental Review and Sediment Management Unit

cc: Marcia Porter, Washington Department of Ecology

⁵ See Final EIS, p. 2-26