Supplement Analysis
for the
Klickitat Hatchery Spring Chinook Upgrades
Final Environmental Assessment (EA)(DOE/EA-2207/SA-01)

BPA project number 1988-115-35
BPA contract number 94983

Bonneville Power Administration
Department of Energy

Background

In August 2023, BPA completed the Klickitat Hatchery Spring Chinook Upgrades Final Environmental Assessment (EA)(DOE/EA-2207) and Finding of No Significant Impact (FONSI) documenting BPA's decision to fund capital improvements to the Klickitat Hatchery facilities to support an increase in spring Chinook salmon production from 600,000 spring Chinook yearling smolts to 800,000 smolts, and a transition from a segregated to an integrated spring Chinook program that incorporates natural-origin fish in the broodstock. The Facility will be owned and operated by the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).

This supplement analysis (SA) was prepared to determine whether the modifications associated with construction of a retaining wall along a 100-foot-long section of the hatchery water supply pipeline and the installation of a concrete washout is a substantial change to the proposal or presents substantial new circumstances or information about the significance of the adverse effects that bear on the analysis and that were not addressed by the EA. The analysis and findings of this SA determine whether additional National Environmental Policy Act (NEPA) documentation is needed consistent with 10 C.F.R. § 1021.314.

Proposed Activities

Construction activities associated with the capital improvements proposed for the Klickitat Hatchery, including staging and initial site preparation, began in September 2024. The need for additional workspace associated with a concrete washout and retaining wall were identified after the start of construction.

The proposed action described in the EA discusses the replacement of the original water supply pipeline to the hatchery that was constructed in 1949 originating at Indian Ford A Spring, located on the hillside across the river from the Klickitat Hatchery. The existing water supply is from a 19-inch-diameter pipeline that travels about 1,800 linear feet from the spring at an elevation of 300 feet above the Klickitat River. A new 24-inch-diameter welded steel pipeline is planned to be routed above-ground, parallel to the existing 19-inch-diameter pipeline, which would be retired in place and not removed to minimize soil disturbance on the steep slope.

During site preparation along the pipeline, the construction contractor identified the need to stabilize the slope running along a 75-foot-long section of the new pipeline to allow workers to safely work beneath the slope. The EA did not consider the construction of a retaining wall along the pipeline.

The retaining wall would be approximately 8 feet tall and constructed of ecoblocks, a concrete block made from recycled construction aggregate. The slope would be excavated back approximately 12 feet, measured at the base of the cut, and a total of roughly 250 cubic yards would be removed. The wall would remain in place after the pipeline is installed to further protect the pipeline and hatchery staff accessing the pipeline.

A concrete washout to safely dispose of the slurry from cleaning out the chutes and hoppers of concrete trucks and other equipment is proposed for a pullout alongside Fish Hatchery Road, the gravel road that leads to the hatchery, on land managed by Washington State Department of Natural Resources (DNR). A land use permit would be acquired from DNR to permit the temporary use of the easement for this purpose. The washout would measure approximately 16 feet by 16 feet and would be composed of hay bales placed around the perimeter of the existing graveled pullout surface and lined with plastic to form a basin. A portable, 6-foot-tall chain link fence would be placed around the station and locked when not in active use. After moisture has evaporated and the concrete waste is cured, the remaining hardened waste product would be removed to an approved disposal facility by the construction contractor or possibly used within the construction site for fill. Some minor grading and leveling of the existing pullout may be necessary prior to use.

The material and heavy equipment that would be needed for these activities include an excavator, concrete trucks, and smaller equipment, such as a skid steer and hand tools.

Analysis

With the concrete washout area and retaining wall modifications, the effects of the Klickitat Hatchery Spring Chinook Upgrades project would essentially be the same as described in the 2023 Final EA. The Final EA analyzed impacts of ground disturbing hatchery construction activities including replacement of the water supply pipeline; rehabilitation of an existing surface water pump station; repairs to the existing hatchery fishway; construction of a new adult holding and spawning facilities, circular raceways, and a new distribution box to supply to them; and a new effluent treatment system.

Ground preparation activities for the retaining wall and concrete washout would be consistent with and similar to the ground preparation that would be required for several project components that are listed in Section 2.2.2, *Facility Upgrades*, and the associated construction effects described in Chapter 3 of the Final EA. Mitigation measures included in the Final EA and Mitigation Action Plan and adopted in the FONSI include minimizing the construction disturbance area and removal of vegetation to the greatest extent possible; washing heavy equipment before delivery to project site to remove potential contaminants; and inspecting and cleaning equipment regularly. The same mitigation measures identified in the Final EA would be applied to actions taken to prepare the site and construct the retaining wall and concrete washout.

Construction of the proposed activities would have no additional effect to geology and soils. The Final EA describes in Section 3.2.2, *Environmental Consequences – Proposed Action*, that the contractor would minimize the disturbance area for the pipeline installation to the extent feasible and will revegetate disturbed slopes and place limitations on the use of equipment in areas with highly erodible soils. The retaining wall would serve as long term protection against future soil movement that could jeopardize the operation and maintenance of the pipeline. The concrete washout would be constructed in an existing flat, gravel pullout alongside the existing road leading to the hatchery. The washout would be removed at the end of construction, and the site restored to its existing graveled condition. Impacts of the proposed activities on geology and soils are consistent with those described and evaluated in the Final EA.

There are no Endangered Species Act (ESA)-listed plants in the project area. Disturbance of non-native vegetation types by the project was already considered and evaluated in Section 3.3, *Vegetation and Noxious Weeds,* of the Final EA. Construction of the retaining wall would require minimal removal of vegetation within the limits of construction, as discussed in the EA. The concrete washout would be located in an existing road pullout, and no additional vegetation removal would be needed. Thus, there would be no effect to vegetation. Upon completion of construction, all equipment and materials would be removed and the newly disturbed areas would be reseeded (for the retaining wall) or returned to existing conditions (for the concrete washout), as described in Mitigation Action Plan for the Final EA. This would result in no change to vegetation compared to the current condition and would be consistent with the vegetation impacts discussed in Section 3.3.

The proposed additional retaining wall and concrete washout would likely not impact ESA-listed fish or wildlife species. The northern spotted owl, gray wolf, and Oregon spotted frog have the potential to occur within or near the project area, as described in Section 3.7, *Wildlife*, of the Final EA. The Final EA discusses that the timing of the work, and efforts to minimize construction noise and disturbance at critical life stages would ensure that there are no-to minimal impacts to these species. Two ESA-listed fish species can be found within the project vicinity, including the threatened Columbia River bull trout, and the threatened Middle Columbia River steelhead. There are no ESA-listed mammals or birds in the project area. The Final EA discusses that no instream work is proposed and that construction activities may result in an increase in erosion and runoff. The application of best management practices to contain and filter runoff would minimize potential effects to ESA-listed fish and the Klickitat River. Construction activities would not be expected to increase turbidity and suspended sediment levels in the river to levels harmful to fish, as described in the Final EA. Through the implementation of the mitigation measures described above and in the Final EA, impacts of the proposed additional concrete washout and retaining wall on fish, wildlife, and plant species are consistent with those described and evaluated in the Final EA.

The retaining wall and washout station would not impact known cultural or historic resources. The project area was surveyed multiple times from 2011 to 2022 by the Yakama Nation Cultural Resource Program. These surveys identified historic and cultural resources within the project area and consultation with the Yakama Nation undertaken during preparation of the Final EA prescribed that BPA would coordinate with Yakama Nation to determine when a cultural monitor would be needed during construction, and a monitor would be present during construction of the retaining wall. A BPA archaeologist initiated consultation and made a no effect determination with the Yakama Nation Tribal Historic Preservation Office on the installation of the concrete washout since its proposed location is outside of the Area of Potential Effect that was previously consulted on. Concurrence with the determination of no historic properties affected under §36 CFR 800.4(d)(1) was assumed following the completion of a 30-day consultation period.

The visual effects of the retaining wall and temporary concrete washout would not differ from the impacts described in the Final EA. The Final EA describes clearing of vegetation, grading and construction of facilities, such as a retaining wall around the circular raceways and pollution abatement pond, and that these features would be consistent with existing structures and use of the site. The retaining wall on the hillside would be constructed parallel to the new 24-inch-diameter pipeline and would be a permanent feature and in the same scale and visual context to the new pipeline. The concrete washout would be a temporary structure erected within a road pullout, immediately adjacent to a road. It would create a short-term impact to visual quality but would be consistent with the existing visual impact of the road. Impacts of the retaining wall and washout station are consistent with those described and evaluated in the Final EA.

In addition, the effects of the retaining wall and concrete washout would not differ from the impacts described in the Final EA to wetlands, recreation, water quality/quantity, noise, transportation, air quality, and socioeconomic resources. These effects would include: no removal/fill in wetlands; no impediment to river navigation and potential long term beneficial impacts to recreational fishing; minimal potential for sediment or contaminants to enter the river; short-term increased noise during construction, minimal increase in vehicle traffic hauling materials; short term, increased emissions from construction activities; and short term economic benefits from construction spending, but they are consistent with the analysis described in the Final EA. Because the proposed activities would occur in the same vicinity and would be similar to construction effects analyzed in the Final EA and impacts to resources would not substantially deviate from those described in the Final EA, the modification associated with the washout and retaining wall do not represent a substantial change in the project relevant to environmental concerns and do not represent substantial new circumstances or information relevant to environmental concerns bearing on the EA's Proposed Action or associated impacts.

Findings

BPA finds that the proposed activities and potential impacts related to the construction of a retaining wall along the water supply pipeline and a concrete washout are similar to those analyzed in the Klickitat Hatchery Spring Chinook Upgrades Final Environmental Assessment (DOE/EA-2207, Aug 2023). There are no substantial changes in the EA's Proposed Action and no substantial new circumstances or information relevant to environmental concerns bearing on the EA's Proposed Action or associated impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9.[1] Therefore, no further NEPA analysis or documentation is required.

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[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 own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its obligations under NEPA, 42 U.S.C. §§ 4321 *et seq*.