#### **Supplement Analysis**

for the

# Federal Support for the Phase 2 Implementation Plan: Testing Feasibility of Salmon Reintroduction in the Upper Columbia River Basin Final Programmatic Environmental Assessment

(DOE/EA-2250/SA-01)

#### **P2IP 2026 Activities**

Bonneville Power Administration
Department of Energy



#### Introduction

In May 2025, Bonneville Power Administration (Bonneville), the Bureau of Reclamation, and the U.S. Army Corps of Engineers (Action Agencies) completed the Federal Support for the Phase 2 Implementation Plan: Testing Feasibility of Salmon Reintroduction in the Upper Columbia River Basin Programmatic Environmental Assessment (DOE/EA-2250) (PEA). The PEA analyzed activities that test the feasibility of reintroducing non-Endangered Species Act (ESA)-listed salmon in the Upper Columbia River Basin over the next 20 years. In May 2025, Bonneville issued a Finding of No Significant Impact based on the analysis in the PEA.

Consistent with the PEA, this supplement analysis (SA) analyzes the Phase 2 Implementation Plan (P2IP) activities that the Confederated Tribes of the Colville Reservation, the Coeur d'Alene Tribe, and Spokane Tribe of Indians (P2IP Proponents) are proposing to implement with Bonneville funding during 2026 in accordance with the terms of the existing Funding Instrument between Bonneville and the P2IP Proponents. Bonneville would provide funding for certain P2IP 2026 activities supporting the reintroduction of specific non-federally protected salmonid stocks above Chief Joseph and Grand Coulee dams in the Upper Columbia River Basin consistent with the Bonneville Administrator's settlement authority described under 16 U.S.C. § 832a(f) and the Memorandum of Understanding (MOU) and Mediated Settlement Agreement (P2IP Agreement).

This SA analyzes the proposed 2026 P2IP activities to determine if they are within the scope of the activities and analysis considered in the PEA. The SA also evaluates whether the proposed 2026 P2IP activities present substantial new circumstances or information about the significance of the adverse effects that bear on the analysis and that were not addressed by the PEA. The findings of this SA determine whether additional analysis is needed under the National Environmental Policy Act (NEPA), as amended, and DOE's Implementing Procedures (dated June 30, 2025).

#### Background

The PEA evaluated actions including, but not limited to, distribution of federal funding to support the operation and maintenance of P2IP equipment and facilities, and site-specific P2IP activities, where site details were available. The PEA stated that any P2IP activities that required site-specific engineering designs would be evaluated in future environmental compliance documentation. Table 2-2 of the PEA (included below) listed the P2IP activities by category and identified whether the activity has been fully evaluated in the PEA or would need additional site-specific environmental compliance evaluation.

Table 2-2. P2IP Activities and Environmental Compliance Processes

Research Activities	PEA	Future Environmental Compliance
Acquisition/Collection of Eggs, Juveniles, and Adult	Χ	·
Salmon		
Salmon Marking (Tagging)	X	
Salmon Release	X	
Spawning and Carcass Surveys	Χ	
Telemetry Receiver Installation/Operations &	X	
Maintenance		
Rearing Activities	PEA	Future Environmental Compliance
Salmon Incubation, Early Rearing, and Acclimation	X	
Data Collection for Proposed Acclimation Facility	X	
Design		
Tributary Streamside Incubation Boxes	Χ	
Acclimation Facility Construction		X
Interim Passage	PEA	Future Environmenta
		Compliance
Adult Trap and Transport from existing facilities*	X	
Data Collection for Proposed Interim Passage	X	
Design		
Construction and Testing of Interim Upstream and		Χ
Downstream Passage		

<sup>\*</sup>Trapping of adult salmon at existing facilities (i.e., dams, hatcheries, etc.) would be completed consistent with the existing authorizations of those facilities. P2IP activities would not increase the number of fish collected. The P2IP activity is specific to the transport of salmon into the blocked area above Chief Joseph and Grand Coulee dams.

An annual environmental compliance review process was described in the PEA (Section 2.3.2) that stated that the Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, and Coeur d'Alene Tribe, through and with the assistance of the Upper Columbia United Tribes (UCUT), would prepare an annual work plan identifying activities planned for the following year for environmental compliance review.

#### **Proposed Action**

In September 2025, the Project Proponents submitted an annual work plan for 2026 activities. The 2026 work plan identified planning and data gathering, deployment of telemetry equipment, installation of rotary screw traps, and installation of egg boxes as described further below and listed in Attachment A.

#### Planning and data gathering

The Project Proponents proposed various desktop planning and data gathering activities necessary for developing engineering designs for future year activities. These activities require planning and data gathering actions that include, but are not limited to, geotechnical studies and surveys, along with existing operational data to characterize site conditions and hydrologic modeling. These activities are not expected to result in on-the-ground disturbance and would use existing data and information sources.

In addition, flights using fixed wing aircraft and helicopters would collect data related to fish use and spawning via visual observations.

#### Deployment of telemetry receiver equipment

The Project Proponents propose to install and maintain new receiver equipment at existing telemetry sites and to establish new telemetry sites. Installation of telemetry and tracking receivers would occur at various locations in Lake Roosevelt, the mainstem Columbia River, the Spokane River, Lake Rufus Woods, the Little Spokane River, the Sanpoil River, Hangman Creek, Banks Canal, and other sites in the area above Chief Joseph Dam, as needed. The receivers fall into four general categories: 1) anchored submersible; 2) shore-based; 3) track trolley shore-based; and 4) forebay log boom (Section A.1 of Appendix A to the PEA).

Anchored submersible receivers are self-contained and battery powered. They are deployed using concrete anchors connected to a chain and stainless-steel cable to ensure no movement of the anchor across the riverbed. The cable is connected at the surface to a large and lighted metal buoy (can buoy) with sufficient buoyancy to suspend the cable weight. Telemetry receivers are suspended from the can on a second cable below the buoy in the water column.

Shore-based telemetry receivers are powered by batteries charged with solar panels affixed to existing structures. Batteries and receivers are housed in a box that is placed along the shoreline above the ordinary high-water mark. Wiring runs from the box and is draped along the ground, into the water and connected to a hydrophone affixed to a custom fabricated 50-pound steel mounting plate, which also acts as an anchor.

Track and trolley shore-based telemetry receivers are similar to the shore-based telemetry receivers in that a box and receiver is attached to the dam or existing structure, is powered by solar panels, and has wires attached to hydrophones. The hydrophones are mounted onto a custom fabricated trolley that slides up and down the channel on a vertical track that is bolted into the concrete of the dam. The depth of the hydrophone and trolley can be adjusted based on reservoir levels.

Forebay log boom telemetry receivers are the same as those used for the shore-based telemetry receivers with the batteries and receivers housed in a box with solar panel power, but the receiver, battery, and solar panels are attached to the can buoys using cables, quick links, and turnbuckles. The hydrophone is attached to a 10-pound lead ball and suspended approximately 10 feet below the water surface.

#### Installation of rotary screw trap

The Project Proponents would install a new rotary screw trap in the Little Spokane River. Unassembled trap parts would be transported to the boat ramp nearest to the installation site, and the trap would be assembled in the water. The assembled trap would then be towed by boat to the operating location, where the trap would be anchored in place to a bridge or tree. The trap would be removed in the fall.

#### Installation of streamside incubation boxes

Streamside incubation boxes would be installed in the Sanpoil River, Little Spokane River, and potentially additional locations in the future. Streamside incubation boxes use small, screened pumps to divert stream water to fertilized salmon eggs inside the incubation boxes that are placed along the river margins (Section B.4 of Appendix B to the PEA).

#### **Environmental Effects**

Planning and data gathering activities would be purely administrative and do not require BPA to take any action that would have a potential effect on the human environment and are, therefore, excepted from NEPA review under Appendix A at 10 Code of Federal Regulations §1021.

The effects for the installation of telemetry receivers, screw traps, and streamside incubation boxes would be consistent with the PEA. The 2026 installation activities are most likely to affect air and water quality, visual resources, and cultural resources. Tribal interests, socioeconomics, and Indian trust assets are not anticipated to be affected.

Installation of telemetry equipment and transporting the screw traps and incubation boxes would require a minor number of vehicles and boats to temporarily access the project area that would result in increased air pollutant emissions from gasoline-fueled, on-road vehicles, trucks, and motorboats used for transportation of staff, equipment, and fish. Air quality impacts would be temporary and localized in nature, with no long- or short-term violations of state air quality standards expected to occur.

The installation of telemetry equipment would result in short-term, minor turbidity associated with anchor installations and small-scale ground clearance to site the shore-based receiver boxes. Anchoring of the screw traps and incubation boxes would be done on the shoreline with appropriate erosion control as needed and would not cause water quality effects. The turbidity effects of shore-based receiver and screw trap anchor installation activities are consistent with the analysis in Section 3.5 of the PEA ("Water Quality"). The small, temporary quantity of turbidity generated by telemetry anchor installations would be within the range of sediment generated analyzed in Section 3.5 of the PEA ("Water Quality") and the project's ESA Section 7 consultation biological opinions. The 2026 activities would result in overall minor water quality impacts caused by increased sediment during installation.

Screw trap operation would result in increased minor stress and more potential for injury or mortality to target and non-target fish captured. Further, the installation of telemetry equipment may also cause short-term minor stress or injury during in-water equipment installation. These effects to biological resources would be consistent with Section 3.6 of the PEA.

On October 2, 2025, the Action Agencies communicated with USFWS that they had determined that all planned FY26 activities are consistent with the activities described in the USFWS 2025 Phase 2 Implementation Plan Testing Feasibility of Salmon Reintroduction in the Upper Columbia River Basin Biological Opinion (reference number 2025-0033182). The USFWS Responded on November 5, 2025 with their concurrence. On October 15, 2025, the Action Agencies reached out to NMFS and communicated their conclusion that the activities that would be funded in 2026 are covered under the Federal Support of the Phase 2 Implementation Plan Testing Feasibility of Salmon Reintroduction in the Upper Columbia River Biological Opinion (NMFS Consultation Number: WCRO-2024-02940).

For the telemetry equipment, screw trap, and streamside incubation boxes identified for installation in 2026, BPA has completed a National Historic Preservation Act (NHPA) Section 106 consultation with the Washington Department of Archaeology and Historic Preservation (activities outside of reservation boundaries), Colville Tribal Historic Preservation Office (activities within reservation boundaries), and appropriate Indian Tribes. BPA determined that the proposed activities would result in no adverse effect to historic properties. Based on this finding of effect, proposed 2026 activities are consistent with the analysis in Section 3.7 ("Cultural Resources"), which describes future NHPA Section 106 compliance.

Installation of telemetry equipment, screw traps, and incubation boxes would introduce a minor new or altered visual contrast to the landscape. The effects of 2026 activities would be consistent with the analysis in Section 3.10 ("Visual Resources"). The PEA describes overall minor visual resource impacts because the small-scale, site-specific research and monitoring activities may entail minor ground-disturbing activities related to the installation of new shore-based telemetry receivers and screw traps. Further, given the low degree of contrast that would be created by the installation of shore-based and submersible telemetry receivers and screw traps, impacts on visual quality would be long term, but minor. Similarly, the incubation boxes would be temporary and have a low degree of contrast and low profile that would result in a minor impact on visual quality, consistent with Section 3.10 ("Visual Resources").

Because the planned 2026 actions are similar to the activities and impacts analyzed in the PEA, the P2IP 2026 actions would not represent a substantial change in the project relevant to environmental concerns and present substantial new circumstances or information about the significance of the adverse effects that bear on the analysis and that were not addressed by the PEA.

#### **Findings**

This SA finds that the proposed actions and potential impacts related to planned P2IP 2026 actions are similar to those analyzed in the *Federal Support for the Phase 2 Implementation Plan Testing Feasibility of Salmon Reintroduction in the Upper Columbia River Basin* Programmatic Environmental Assessment (D0E/EA-2250, April 2025). 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 NEPA and the D0E NEPA Implementing Procedures (dated June 30, 2025). Therefore, no further NEPA analysis or documentation is required.

Ted Gresh Environmental Protection Specialist

Concur:

Katey Grange NEPA Compliance Officer

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<sup>&</sup>lt;sup>1</sup> 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.

## Attachment A: List of 2026 P2IP Actions

### Summary of P2IP Actions for FY26

- 1) Egg Boxes and Hatchery Development Planning and Data Gathering Activities Each of the tribes will be making progress on planning, design, and development of hatchery and acclimation facilities at the following locations:
  - a. Louie Creek Data Gathering (NUID 245) Geotechnical studies and drilling and pump testing to support the potential development of up to 3 hatchery production scale wells at the proposed Louie Creek acclimation site in the Sanpoil River.
  - b. Install Louie Creek Streamside Incubation Boxes (NUID 371) Streamside incubation boxes would use small, screened pumps to divert stream water to fertilized salmon eggs inside the incubation boxes that are placed along the river margins.
  - c. sqweyu' Data Gathering (NUID 271) Data gathering may include, but is not limited to, the drilling of groundwater wells and geotechnical studies for siting and facility design for facility improvements.
  - d. Little Falls Acclimation Facility Planning (NUID 132) Design work needed to support potential construction in Fiscal Year 2027.
  - e. Glen Tana Data Gathering (NUID 87) Data gathering may include, but is not limited to, groundwater wells and geotechnical studies for siting and facility design (building, water diversion, power, backup generators, etc).
- 2) Telemetry (acoustic/radio) Receiver Equipment and Data Gathering Studies Several new studies will be initiated in Fiscal Year 2026 that will rely on the existing acoustic receivers and newly-installed receivers. Further, data would be collected with traps, PIT arrays, and aerial observation surveys. The following studies and equipment installation would include:
  - a. Adult Chinook behavior in Lake Roosevelt deployments at existing receiver locations (NUIDs 23, 162, 261) and new sites (NUIDs 448 457).
  - Little Spokane adult behavior and spawning success at new receiver sites (NUIDs 394 415).
  - c. Juvenile fish passage survival, sockeye and subyearling Chinook studies at new receiver sites (NUIDs 436 440, 447).
  - d. Adult tailrace behavior at Grand Coulee Dam tailrace new receiver sites (NUIDs 441 446) and Chief Joseph Dam tailrace new receiver sites (NUIDs 417 435).
  - e. Installation of a new rotary screw trap in the Little Spokane River (NUID 366).
  - f. Fish captured at Sanpoil and Little Spokane rotary screw traps would be tagged and released (NUIDs 145, 146, 249, 250, 278).
  - g. Installation of new PIT array in Little Spokane River (NUID 416).
  - h. Aerial surveys of spawning locations for data collection purposes utilizing helicopter and/or fixed wing aircraft (UID 167).