

# **Phase 2 Implementation Plan (P2IP)**

## **Testing Feasibility of Salmon Reintroduction in the Columbia River Basin**

Finding of No Significant Impact  
Bonneville Power Administration  
DOE/EA-2250  
May 2025

### **INTRODUCTION**

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Bonneville Power Administration (BPA) announces its environmental findings for the Phase 2 Implementation Plan (P2IP) Testing Feasibility of Salmon Reintroduction upstream of Chief Joseph, Grand Coulee, and Spokane River dams. BPA, the Bureau of Reclamation (Reclamation), and the US Army Corps of Engineers (USACE) (co-lead agencies) and other federal departments and agencies entered into an agreement with the Confederated Tribes of the Colville Reservation, the Coeur d'Alene Tribe, and the Spokane Tribe of Indians to fund implementation of the P2IP projects in September 2023. Under the terms of that agreement, BPA proposed to provide \$200 million over the anticipated 20-year agreement. BPA, Reclamation, and USACE have prepared a programmatic environmental assessment (PEA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended. The co-lead agencies developed the PEA evaluating the P2IP Proposed Action and the No Action Alternative. The PEA was released for a 30-day public comment period on November 14, 2024. In response to a request, the comment period was extended to December 20, 2024. All comments received during the public comment period were addressed in the response to comments document, which is part of the Final PEA.

BPA hereby adopts the PEA, and based on its analysis and public comments received, BPA has determined that the Proposed Action is not a major federal action significantly affecting the quality of the human environment, within the meaning of NEPA (42 United States Code [USC] 4321 *et seq.*).<sup>1</sup> Therefore, the preparation of an environmental impact statement (EIS) is not required and BPA is issuing this Finding of No Significant Impact (FONSI) for the Proposed Action. The Proposed Action is not the type of action that normally requires preparation of an EIS and is not without precedent.

The PEA included Environmental Protection Measures (EPMs or mitigation measures) to minimize potential impacts. The attached Mitigation Action Plan describes the EPMs that BPA, as well as the project sponsors and its contractors, are committed to implementing.

### **PUBLIC AVAILABILITY**

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The FONSI will be posted on BPA's project website:<http://www.bpa.gov/nepa/P2IP>.

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<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 for the P2IP EA, 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.*

## **PROPOSED ACTION**

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The Final PEA evaluated the Proposed Action, which includes federal support for actions to test the feasibility of restoring salmon in the Upper Columbia River. As part of the Proposed Action, BPA will provide funding consistent with the agreement. The PEA considered a suite of similar activities in the Proposed Action that share a common purpose of testing the feasibility of reintroduction of salmon in the Upper Columbia River Basin over a period of 20 years. The EA analyzes three categories of P2IP activities, including juvenile and adult research studies, salmon rearing and acclimation facilities, and interim fish passage. Specifically, the Proposed Action includes the following:

- To support research studies, adult and juvenile salmon collection would occur at existing hatcheries and acclimation sites and via other collection methods such as seining, fyke netting, hook and line, weirs, and screw traps. Research activities would include the use of PIT tags, acoustic tags and coded wire tags and associated detection receivers to track salmon survival, behavior, and migration. Further on-the-ground surveys, such as spawner surveys, would occur.
- To support salmon rearing and acclimation, collected eggs, juveniles, and adults would be held and produced at a variety of facilities including existing hatcheries, new and proposed acclimation sites, and net pens.
- Interim passage actions would focus on the study, design, installation, testing, and operation of fish passage systems. Data collection may include geotechnical studies and surveys, along with existing operational data to characterize site conditions and hydrologic modeling to aid in the design process. The existing trap and transport program would be expanded with additional release locations and numbers of fish.

The PEA fully evaluates actions including, but not limited to, distribution of federal funding, operation and maintenance of P2IP equipment and facilities, and site-specific P2IP activities, where the details are currently available. P2IP activities that require site-specific engineering design would be evaluated in future environmental compliance documentation as appropriate.

## **NO ACTION ALTERNATIVE**

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The Final PEA evaluated a No Action Alternative, which would involve no new federal actions in support of the P2IP.

## **SIGNIFICANCE OF POTENTIAL IMPACTS OF THE PROPOSED ACTION**

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To determine whether the Proposed Action has the potential to cause significant environmental effects, the co-lead agencies analyzed the potential impacts of the proposal on human and natural resources and presented them in Chapter 3 of the PEA. The potential impacts associated with the Proposed Action are summarized below. The Proposed Action, with implementation of selected mitigation measures, would have no significant impacts. The following discussion provides a summary of the Proposed Action's potential impacts and the reasons these impacts would not be significant.

### **Climate and Air Quality**

Impacts on climate variability and air quality would not be significant.

- P2IP activities including research studies, updates to existing acclimation and rearing facilities and the creation of new acclimation and rearing facilities, and interim passage of fish would result in increased air pollution emissions. Emission sources would include vehicles,

motorboats, and heavy equipment used during data collection. The impacts from emissions would be temporary and minor. Due to the mobile nature of emission sources, the estimated annual emissions and resulting impacts would be spread across the analysis area. As a result, the Proposed Action is not anticipated to contribute to nonattainment status for any portion of the analysis area.

- Temporary emissions of greenhouse gases from P2IP activities could accumulate over time. While annual emissions from P2IP activities would be greater than the No Action alternative, the emissions would account for a minor fraction (0.005 percent) of gasoline-powered highway vehicle and diesel-powered off-highway vehicle and equipment emissions in the counties within the project area.

### **Water Quality**

Impacts on water quality would not be significant.

- Salmon releases and interim passage could potentially affect water quality due to increased nutrient inputs. There would be little negative or positive impacts on water quality because it is unlikely that a large enough concentration of nutrients from released adults would be present in any given location to cause measurable changes or adverse effects on water quality.
- Acclimation and rearing facilities would be expected to result in little effects on water quality. Land-based facilities, such as acclimation facilities, would continue pollutant generation at levels similar to under the No Action Alternative. Water quality impacts from net pens would be controlled and minimized through the implementation of several EPMs such as checking for and removing mortalities at least once per week and efficient feeding.
- For new facilities, any changes in water quality would be addressed in appropriate National Pollutant Discharge Elimination System permits.
- For ground-disturbing activities associated with data collection, antenna installations, geotechnical investigations, and trenching, sediment could enter nearby waterbodies via erosion. Erosion control measures in the EPMs would contain sediment, reducing the possibility of sediment entering local waterbodies and increasing turbidity.

### **Biological Resources**

Impacts on biological resources would not be significant.

- Due to limited, dispersed footprints, ground-disturbing activities such as geotechnical surveys, groundwater testing, and data collection would not be expected to have substantial long-term loss of terrestrial plants and wildlife habitat. The remaining P2IP activities (e.g., fish collection and release) would have no adverse impacts on terrestrial plants and wildlife because the activities would be water based.
- Collection of fish during P2IP activities could result in injury or mortality to non-target anadromous fish species, but these effects would be minor because the effects would only occur during short time periods when research is being conducted. Chinook salmon, sockeye salmon, or steelhead from downstream populations could inadvertently be collected during adult collection activities, but this would be expected to be a low probability of occurrence because it is unlikely that large numbers of the non-target fish would be present at the collection site and mis-identified by collection staff (EPMs require the release of non-target species as soon as practicable) .

- Collection of fish during P2IP activities could result in injury or mortality for non-target resident fish species. Due to low abundance of bull trout in the area and low probability of encountering bull trout, the effects on bull trout would not be significant. Effects could occur for other resident fish species that are more abundant, but those effects would still be minor, because the number of fish affected would be low in the context of the overall resident fish populations. EPMs that include the release of non-target species as soon as practicable would reduce the potential effects on resident fish.
- Release of fish during research activities could affect competition for food and habitat between released salmon and resident species. This effect would be expected to be minor because the overall number of salmon released throughout the project area would be small relative to the resident fish population. Over the long term, a growing salmon population would modify the existing food web. The effects on the food web would include increasing marine-derived nutrients in the area upstream of Chief Joseph, Grand Coulee, and Spokane River dams (blocked area), which would be a beneficial effect on resident fish species.
- P2IP actions to use and expand existing net pens and acclimation facilities would not have significant effects on resident fish because effluent from these facilities would have little effect on water quality due to EPMs (as discussed in the Water Quality section above).

### **Cultural Resources**

Impacts on cultural resources would not be significant.

- Potential for effects to the Kettle Falls sacred site is limited to installation of telemetry receivers or fish releases near the site. These activities would be temporary and would not have long term effects. Additionally, the activities associated with P2IP to support anadromous salmon in the blocked area would be a benefit for the Kettle Falls site by potentially increasing the availability of salmon at a site of historic use.
- As the Tribes defined the Proposed Action and P2IP study locations, little impact to Traditional Cultural Places (TCPs) would be anticipated overall and would be outweighed by the beneficial impacts of salmon reintroduction to the blocked area.
  - Research studies that include collection of fish, salmon releases, and telemetry receiver installation and maintenance would be expected to have minor impacts to TCPs because the equipment used is generally small in size and would not modify the setting, use, or importance of these locations.
  - The continued and expanded use of acclimation and rearing facilities could have impacts on TCPs, but the impacts are expected to be minor. Several of the locations are already in place and are important for providing salmon for the region. New facilities would be reviewed by an appropriately qualified cultural resource specialist to facilitate compliance with Section 106 of the National Historic Preservation Act (NHPA).
  - Interim passage activities such as trap and transport and data collection for interim passage design could have effects on TCPs, but impacts would be expected to be minor. As fish management activities in these areas are already common, impacts would be short term, and not larger in scale than the existing activities. Data collection activities could have impacts through ground disturbance, but it is not expected that this would result in permanent damage to the appearance or integrity of named places or TCPs. Construction of any new facilities would be addressed through the NHPA Section 106 compliance process.

- Although ground-disturbing activities (e.g., geotechnical data collection, installation of research equipment) could result in displacement of cultural materials, impacts would be avoided, minimized, or mitigated through the NHPA Section 106 consultation process for resolving adverse effects.
- Research studies, including fish collection, telemetry receiver installation, and fish releases would have little to no impact on built-environment resources because they would occur within existing facilities and would require no modifications to those facilities or new construction. The installation of new or additional telemetry resources could affect built-environment resources, but effects would be temporary (the lifespan of the research study). Additionally, the equipment is generally small in size, requires minimal installation, and is easily removed.
- Acclimation and rearing activities at existing facilities would have no effect on archaeological resources, as the facilities are already in place. Any new facilities would require site-specific NHPA Section 106 compliance prior to installation.
- Existing acclimation and rearing facilities would not be modified in such a way that built-environment resources would be affected. There could be some ground disturbance associated with data collection (e.g., geotechnical data) for the design of future facilities, but this would be short-term in nature and small in scale.
- Interim passage activities, including trap and transport of adults, would not require ground disturbance or placement of new facilities and would therefore have no impact on archaeological resources.

### **Tribal Interests**

Impacts on tribal interests would not be significant.

- Salmon reintroduction would allow for the continuation and maintenance of important Tribal economic, cultural, and spiritual activities. Therefore, the P2IP actions are anticipated to have long-term beneficial impacts on Tribes and the continuation of traditional uses and practices. Overall, the P2IP project would facilitate potential salmon reintroduction efforts and would be beneficial to Tribal communities.

### **Socioeconomics and Environmental Justice**

Impacts on socioeconomics and environmental justice<sup>2</sup> would not be significant.

- Activities would be expected to have minor increases in regional jobs and income due to the limited direct employment associated with the types of proposed activities (e.g., research studies and acclimation/rearing facilities for juvenile salmon).
- Should translocation of salmon result in long-term increases in the number of salmon available to Tribes, there would be the potential for benefits to Tribes by increasing the number of salmon available for ceremonial, subsistence, and research purposes.
- P2IP activities are expected to have minor increases in economic contributions from commercial and recreational fishing. Small increases in the abundance of anadromous salmon could occur, which would be beneficial, but would likely be small in scale.

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<sup>2</sup> EO 12898 was rescinded on January 21, 2025, and EO 14096 was rescinded on January 20, 2025. The environmental justice analysis was made available to the public in the draft P2IP EA on November 13, 2024, prior to the rescission of either EO.

- P2IP activities could result in minor adverse effects that would not be significant (as described in the previous resource sections) and some beneficial effects (e.g., employment, salmon available to Tribes, and fishing opportunities).

### **Visual Resources**

Impacts on visual resources would not be significant.

- P2IP research studies could result in small-scale changes to the visual landscape. 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 from research studies would be long term but minor.
- Data collection and site assessment activities could be visible to recreationists at dispersed fishing, boating, and camping sites. The limited human-made structures and ground disturbance would create a low degree of contrast relative to the existing visual setting.
- Because ground-disturbing activities associated with site assessments would occur over a period of days or weeks and would be dispersed and revegetated upon completion, the temporary impacts from these activities would be minor.
- Other P2IP activities, including fish collection, trap and transport, and fish release would not have impacts on visual quality, as they would not entail equipment installation, ground-disturbing activities, or construction.
- While the installation of new net pens on the Sanpoil Arm would cause minor impacts on visual resources due to the introduction of new human-made structures and associated lighting, the visual effects of the installation would be relatively localized and would occupy a small portion of the Sanpoil Arm that has been developed with human-made structures. The P2IP EPMs and design features would include color schemes and structural features to allow the facilities to blend in with surrounding landscape features; therefore, impacts on visual resources would not be significant.

### **Wetlands and Floodplains**

Impacts on wetlands and floodplains would not be significant.

- Actions such as the collection, handling, rearing, transport, marking, and release of eggs, juveniles, or adult salmon are expected to have no ground-disturbing or flow-affecting activities and would, therefore, have no effect on wetlands or floodplains.
- Siting of telemetry receivers and incubation boxes, and the data collection for future land-based acclimation and interim passage facilities would not take place within large wetlands, as these conditions are unsuitable for these facilities, but they would likely be within floodplains. The facilities' footprints in these floodplains would likely be small in relation to the floodplains they affect, with most surfaces retained as pervious (unpaved) and thereby still functional for groundwater recharge (a key function of floodplains). EPMs, such as wetland mapping and minimization of footprints in floodplains, would be implemented to further minimize impacts on wetlands and floodplains.
- Streamside incubation boxes would require a small amount of flow diverted from their adjacent streams or rivers, but the diversions would be of short distances, and water use would not be consumptive (i.e., returned to the adjacent streams). Thus, there would be little to no effect on the local hydrology affecting the floodplains or nearby small wetlands.

## DETERMINATION

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Based on the information in the PEA, as summarized here, BPA determines that the Proposed Action is not a major federal action significantly affecting the quality of the human environment within the meaning of NEPA, as amended (42 USC 4321 *et seq.*). Therefore, an EIS will not be prepared, and BPA is issuing this FONSI for the Proposed Action.

Finally, consistent with Department of Energy's regulations in 10 Code of Federal Regulations (CFR) § 1022 *et seq.* (*Compliance with Floodplain and Wetland Environmental Review Requirements*), the Proposed Action would not result in significant impacts to any wetlands as referenced above and presented in Chapter 3 of the PEA. Consistent with 10 CFR § 1022.12 and 1022.13, all impacts to floodplains from the Project have been assessed and proper notification provided. As discussed in 10 CFR § 1022.14, Chapter 2 and Appendix F of the Final PEA includes a description of the Project Action; the alternatives; and proposed mitigation measures to avoid and mitigate any potential impacts from these actions.

Issued in Portland, Oregon.

SCOTT G. ARMENTROUT  
Executive Vice President  
Environment, Fish and Wildlife

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