

**Supplement Analysis**  
for the  
**Umatilla Hatchery Programs Final Environmental Assessment**  
**(Umatilla River Fall Chinook, Spring Chinook, and Coho)**  
(DOE/EA-2249/SA-01)  
and  
**Mid-Columbia River Basin Hatcheries Environmental Assessment**  
**(Touchet River Endemic Summer Steelhead, Umatilla River Summer Steelhead, Round Butte Hatchery Summer Steelhead, Round Butte Hatchery Spring Chinook Salmon, Hood River Winter Steelhead, and Hood River Spring Chinook Salmon Hatchery)**  
(DOE/EA-2132/SA-01)

**BPA project numbers 1983-435-00, 1989-035-00**

Bonneville Power Administration  
Department of Energy



## **Background**

In November 2021, National Marine Fisheries Service (NMFS), with Bonneville Power Administration (BPA) as a cooperating agency, completed the *Mid-Columbia River Basin Hatcheries Environmental Assessment (Touchet River Endemic Summer Steelhead, Umatilla River Summer Steelhead, Round Butte Hatchery Summer Steelhead, Round Butte Hatchery Spring Chinook Salmon, Hood River Winter Steelhead, and Hood River Spring Chinook Salmon Hatchery)* (DOE/EA-2132). The Environmental Assessment (2021 EA) analyzed the potential impacts of BPA's continued funding of the Umatilla River summer steelhead (*Oncorhynchus mykiss*) program, which included program-related operation and maintenance and monitoring and evaluation activities to support the production of about 150,000 steelhead juveniles.

In April 2024, BPA completed the *Umatilla Hatchery Programs Final Environmental Assessment (Umatilla River Fall Chinook, Spring Chinook, and Coho; DOE/EA-2249)*. The 2024 EA analyzed the potential impacts of BPA's continued funding of the Umatilla River fall Chinook salmon (*O. tshawytscha*) program, which included program-related operation and maintenance and monitoring and evaluation activities to support the production of about 600,000 subyearling fall Chinook.

Consistent with the 2021 and 2024 EAs, this supplement analysis (SA) analyzes proposed release location changes for fall Chinook and summer steelhead programs for the Umatilla Hatchery production programs that differ from the proposed release locations in the original EAs.

## **Proposed Activities**

BPA proposes to fund the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) for the ongoing releases of Umatilla River fall Chinook and summer steelhead from Umatilla Hatchery production programs. CTUIR has proposed program modifications that deviate from the proposed actions described in the EAs. Specifically, the CTUIR has proposed alterations to the juvenile release locations for summer steelhead and fall Chinook. No other production program or facility changes are

proposed, and the programs would remain consistent with what is described in the 2021 and 2024 EAs. The proposed release locations differ from those outlined in the EAs as follows:

Summer steelhead: The 2021 EA stated that summer steelhead juveniles would be acclimated and released from Pendleton (Umatilla River mile (RM) 56) and Thornhollow (Umatilla RM 73.5) acclimation facilities. All summer steelhead juveniles would be acclimated and released from Pendleton.

Fall Chinook: The 2024 EA has conflicting information regarding the proposed release location of 600,000 subyearling fall Chinook. Section 1.3.4 indicates that all fish would be transferred to the Pendleton Acclimation Facility (Umatilla RM 56) to be acclimated and released. Table 3 shows that all fish would be direct released at Rieth Bridge (Umatilla RM 48). CTUIR proposes that all fish would be transferred to the Pendleton Acclimation Facility to be acclimated and released.

### **Analysis**

The typical environmental impacts associated with the Umatilla River summer steelhead production program are described in Chapter 4 of the 2021 EA. Impacts to water quantity, water quality, fisheries, wildlife, socioeconomics, cultural resources, and environmental justice described in the 2021 EA would be consistent with the impacts expected from a change in release location, so are not analyzed in this SA. The 2021 EA determined that impacts of the program on salmon, steelhead, and other fish species would not be significant (Section 7.2.1). The expected impacts to fish species resulting from a change in release location would be negligible. Despite the Pendleton release location being downstream of Thornhollow, the beneficial effects to adult bull trout from increased prey sources would likely be similar. Releasing all steelhead at a more downstream location is expected to reduce the potential for interactions between migrating juvenile steelhead and juvenile/sub-adult bull trout and residual steelhead and bull trout (i.e., interactions for food and summer/winter rearing habitat) in the upper reaches.

The environmental impacts associated with the Umatilla River fall Chinook production program are described in Chapter 3 of the 2024 EA. Impacts to geology, soils, water resources, vegetation, wetlands, floodplains, wildlife, land use, recreation, visual resources, air quality, noise, public safety, cultural resources, climate change, socioeconomics, and environmental justice described in the 2024 EA are consistent with the impacts expected from a change in release location, so are not analyzed in this SA. The 2024 EA determined that impacts to fish would range from a low adverse impact to moderately to highly beneficial effects (Section 3.2.5.2). The change in release location would have negligible impacts to fish species. No changes to impacts related to genetics and disease are expected because fish production and releases would still occur. Despite the proposed release location being farther upstream, the addition of an acclimation period and volitional releases would support subyearling fall Chinook migrating downstream quickly after release and not overlapping much with bull trout; therefore, there the impacts to fish species from competition for food and rearing habitat would be consistent with those analyzed in the 2024 EA. In addition, releases at the Pendleton facility would continue to result in beneficial effects associated with providing a food source for adult bull trout.

In October 2024, BPA, in coordination with CTUIR, requested consultation from NMFS and the U.S. Fish and Wildlife Service (USFWS) regarding impacts of the release location changes for Umatilla River summer steelhead and fall Chinook production programs on Endangered Species Act (ESA)-listed species. NMFS determined that the changes to release locations will not increase the effects on steelhead beyond what was considered and analyzed, nor alter the critical habitat essential to the conservation of a species beyond the extent already considered in the biological opinions for the production programs (NMFS reference numbers WCR-2010-06511 and WCR-2017-7615). Therefore, there is no need for reinitiation of consultation with NMFS. USFWS agreed with BPA's determination

that the modifications to the proposed action will not change the manner or extent of effects to bull trout or bull trout critical habitat beyond what was considered in the original biological opinion (USFWS reference number 13420-2008-F-0109). Therefore, reinitiation of consultation with USFWS is not required.

### **Findings**

BPA finds that the proposed activities and potential impacts related to the proposed release location changes are similar to those analyzed in the 2021 *Mid-Columbia River Basin Hatcheries Environmental Assessment (Touchet River Endemic Summer Steelhead, Umatilla River Summer Steelhead, Round Butte Hatchery Summer Steelhead, Round Butte Hatchery Spring Chinook Salmon, Hood River Winter Steelhead, and Hood River Spring Chinook Salmon Hatchery)* (DOE/EA-2132) and the 2024 *Umatilla Hatchery Programs Final Environmental Assessment (Umatilla River Fall Chinook, Spring Chinook, and Coho)* (DOE/EA-2249). There are no substantial changes in the 2021 or 2024 EA's Proposed Action and no substantial new circumstances or information about the significance of the adverse effects that bear on the analysis in the 2021 or 2024 EA's Proposed Action or their impacts within the meaning of 10 CFR § 1021.314 and 40 CFR § 1502.9.<sup>1</sup> Therefore, no further NEPA analysis or documentation is required.

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Concur:

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<sup>1</sup> BPA is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, BPA has nonetheless elected to follow those regulations at 40 Code Federal Regulations (C.F.R.) §§ 1500– 1508, in addition to the US Department of Energy's NEPA implementing procedures at 10 C.F.R. Part § 1021, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*