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Phase 2 Implementation Plan: Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin Programmatic Environmental Assessment

Scoping Report



**US Department of the Interior
Bureau of Reclamation
Columbia-Pacific Northwest Regional Office
1150 N. Curtis Road
Boise, ID 83706**

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1 **Acronyms and Abbreviations** Full Phrase

2	Bonneville	Bonneville Power Administration
3	CFR	Code of Federal Regulations
4	EA	environmental assessment
5	EPA	Environmental Protection Agency
6	FONSI	Finding of No Significant Impact
7	MOU	Memorandum of Understanding
8	NEPA	National Environmental Policy Act
9	PEA	Programmatic EA
10	Reclamation	Bureau of Reclamation
11	US	United States
12	USACE	US Army Corps of Engineers

Chapter 1. Introduction

1.1 Background

The Bureau of Reclamation (Reclamation), U.S. Army Corps of Engineers (USACE), and Bonneville Power Administration (Bonneville), jointly referred to as the Co-lead Agencies, intend to prepare a programmatic environmental assessment (EA) for Federal support of the Phase 2 Implementation Plan: Testing the Feasibility of Reintroduced Salmon in the Upper Columbia River Basin (hereafter referred to as “P2IP”), a 20-year plan for testing the feasibility of reintroducing Chinook and sockeye salmon into blocked areas upstream of Chief Joseph, Grand Coulee, Little Falls, Long Lake, and Nine Mile dams. These dams were constructed without fish passage, and the eradication of anadromous fish in the blocked areas affected ecosystems and restricted or eliminated Tribal traditional and cultural practices related to salmon. The P2IP was developed by the Confederated Tribes of the Colville Reservation (CTCR), Coeur d’ Alene Tribe of Indians (CDAT), Spokane Tribe of Indians (STOI), and the Upper Columbia United Tribes (UCUT), collectively referred to as the Proponents. The Proponents’ objective is to complete juvenile and adult salmon studies, test the feasibility of fish passage options, establish fish-rearing and hatchery facilities, and develop a long-term salmon reintroduction plan to serve the following purposes:

- Return salmon to their historic habitats in the upper Columbia River to increase the abundance and distribution of salmon in the Columbia River Basin
- Restore access to salmon for tribal and non-tribal communities in the blocked areas
- Restore tribal traditional and cultural practices related to salmon in the region

Before non-indigenous contact, millions of salmon returned to the Columbia River, were vital to a healthy ecosystem, and sustained tribal communities for many thousands of years. The construction of the five dams halted anadromous salmon passage to the upstream blocked areas and severely restricted or eliminated Tribal traditional and cultural practices related to salmon. Beginning in 2013, a coalition of Columbia Basin Tribes and Canadian First Nations jointly developed a four-phase approach to guide the development of fish passage and reintroduction efforts in the Upper Columbia above Chief Joseph and Grand Coulee dams. Upper Columbia United Tribes completed the Fish Passage and Reintroduction Phase 1 studies in 2019 in coordination with the state of Washington, the US Geologic Survey, and other partners. UCUT developed the Phase 2 Implementation Plan based on the favorable findings of the Phase 1 studies, indicating that reintroduction is viable for the species evaluated.

The Co-lead Agencies, in cooperation with the Proponents, will prepare a programmatic environmental assessment for the Federal support of the P2IP. The P2IP involves activities over an approximately 20-year period to test key biological assumptions developed in the Phase 1 studies through salmon research studies, development of interim acclimation and passage facilities, establishment of donor sources and brood stocks for reintroduction.

1 The Proponents are implementing juvenile survival outmigration studies. The applicable agencies
2 have approved and permitted these activities, which will continue unless changes are identified in the
3 programmatic EA.

4 In late 2023, the CTCR, STOI, and CDAT and the Federal government agreed to pursue a
5 proactive, collaborative, and science-based approach to implementing the P2IP. The Federal
6 government's objectives are to support the P2IP activities consistent with the P2IP agreement,
7 continue to provide an adequate, efficient, economical and reliable power supply that supports the
8 integrated Columbia River Power system and continue to deliver reliable water supplies, manage
9 flood risk, provide reliable navigation and recreation opportunities and minimize environmental
10 impacts.

11 Federal actions associated with the P2IP that will be considered in the programmatic EA include the
12 following:

- 13 • Fund activities throughout the project area including research studies, interim passage, and
14 fish rearing.
- 15 • Reviewing, approving, and issuing permits for actions including but not limited to data
16 collection, installation of equipment, or facility construction on Federally managed land and
17 facilities
- 18 • Provide eggs, juvenile, and adult salmon from existing hatcheries for research studies

19 **1.2 Purpose and Need**

20 The Co-Lead agencies need to consider and respond to the Project Proponent's P2IP proposal in
21 accordance with applicable laws, regulations, and authorities. Reclamation is a U.S. Department of
22 Interior agency that oversees water resource management and power generation related to the
23 operation of diversion, delivery, and storage projects throughout the western United States. Its
24 actions are governed by the 1939 Reclamation Project Act, 43 U.S.C. § 485 *et seq.*, individual project
25 authorizing statutes, particularly those for Grand Coulee Dam, and other statutes. Bonneville is a
26 power marketing administration within the United States Department of Energy (DOE).
27 Bonneville's actions are governed by several statutes, including the Pacific Northwest Electric Power
28 Planning and Conservation Act of 1980 (Northwest Power Act) (16 U.S.C. §§ 839 *et seq.*), the
29 Bonneville Project Act (16 U.S.C. §§ 832 *et seq.*), and the Federal Columbia River Transmission
30 System Act (16 U.S.C. §§ 838 *et seq.*). USACE is the United States Army's direct reporting civil works
31 and engineering unit. In the Columbia River Basin, USACE is responsible for systemwide flood risk
32 management and operating individual projects for power production, fish and wildlife conservation,
33 navigation, water supply, and recreation consistent with the 1944 Flood Control Act, 33 U.S.C. § 701
34 *et seq.*, and individual project authorizing statutes, including the River and Harbor Acts of 1946 and
35 1948.

36 The P2IP entails testing the feasibility of restoring salmon in the Upper Columbia River Basin above
37 the Chief Joseph Dam. In September 2023, CTCR, STOI, CDAT, and the Federal government
38 signed a Memorandum of Understanding (MOU) and Mediated Settlement Agreement (P2IP

1 Agreement) to pursue a proactive, collaborative, and science-based approach to implementing the
2 P2IP. The P2IP Agreement outlines funding and implementation commitments through 2043,
3 including:

- 4 • Bonneville will provide certain funding for implementation of the P2IP projects for
5 reintroducing specific non-Federally protected salmonid stocks above Chief Joseph and
6 Grand Coulee dams in the Upper Columbia River Basin consistent with Bonneville's
7 Administrator's settlement authority under 16 U.S.C. § 832a(f). Consistent with the M.O.U.,
8 Reclamation, USACE, United States Fish & Wildlife Service (USFWS), and National Marine
9 Fisheries Service (NMFS) will work with Project Proponents and Bonneville to identify
10 additional funding needs for implementation of P2IP and seek additional funding as
11 necessary and appropriate to ensure full funding of P2IP activities during the 20-year
12 implementation period.
- 13 • Project Proponents may utilize existing hatchery facilities for activities related to P2IP
14 implementation.
- 15 • The USFWS may provide surplus fertilized eggs, and juvenile and adult salmon of non-listed
16 stock from Federal hatchery facilities to support the study and testing of reintroduction.

17 The P2IP Agreement also establishes a mutual understanding that the P2IP implementation would
18 not interfere with the operation of the Columbia River System and would be subject to the
19 completion of requisite regulatory compliance.

20 In meeting the need for action, the Federal government seeks to achieve the following purposes:

- 21 • Support efforts to study and test the feasibility of reintroducing specific non-Federally
22 protected salmonid stocks above Chief Joseph, Grand Coulee, and Spokane River dams in
23 the Upper Columbia River Basin consistent with the P2IP Agreement.
- 24 • Continue to provide adequate, efficient, economical, and reliable power supply.
- 25 • Continue to deliver reliable water supplies, manage flood risk, provide reliable navigation
26 and recreation opportunities.
- 27 • Minimize environmental impacts.

28 **1.3 Proposed Action**

29 The Proposed Action (Alternative B) is Federal funding and authorizations to support a long-term
30 study to test the feasibility of reintroducing salmon in the blocked area through juvenile and adult
31 salmon research studies, development and operations of fish holding, rearing, and acclimation
32 facilities, and development, testing and operations of interim fish passage systems.

33 Federal Actions may include:

- 34 • Federal funding to support P2IP activities throughout the project area.
- 35 • Review, approval, and issuance of permits for actions including but not limited to data
36 collection, installation of equipment, or construction of facilities (interim passage and/or
37 rearing facilities), on Federally managed lands and facilities.
- 38 • Providing eggs, juveniles, and adult salmon from existing hatcheries.

- 1 • Participate in the planning, design, development, implementation and feasibility assessments
2 of interim passage facilities and guidance structures.

3 **1.4 Overview of the Scoping Process and Scoping Report**

4 Public involvement is a vital and legally required component of the planning process. Public
5 involvement vests the public in the decision-making process and allows for full environmental
6 disclosure. Guidance for implementing public involvement under the National Environmental
7 Policy Act (NEPA) is codified in 40 Code of Federal Regulations (CFR) 1506.6 and described in 40
8 CFR 1501.9. This guidance ensures Federal agencies make a diligent effort to involve the public in
9 the NEPA process.

10 Scoping is an early and open process that helps Reclamation determine the scope of issues to be
11 addressed and extracts the overarching issues that may be added to those addressed during the
12 planning process. These issues help define the scope of the analysis for the programmatic EA; they
13 may also be used to further develop the programmatic EA's alternatives.

14 In accordance with 43 CFR 1610.2, Reclamation must document the public scoping results. This
15 scoping report summarizes the scoping process and the comments received during the formal
16 scoping period.

17 **1.5 Description of the Scoping Process**

18 As described in Title 43, Subtitle A, Part 46, Subpart C 46.235(a) of NEPA, scoping is not required
19 for an EA. The Co-lead Agencies can use the scoping process as an opportunity to introduce and
20 explain the interdisciplinary approach and solicit information as to additional disciplines that should
21 be included in the programmatic EA. Scoping also provides an opportunity to bring agencies and
22 applicants together to lay the groundwork for setting time limits; expediting reviews, where feasible;
23 integrating other environmental reviews; and identifying any major obstacles that could delay the
24 process.

25 **1.5.1 Public Scoping Period**

26 Per 40 CFR 1501.9, Co-lead Agencies sent a notice to interested parties requesting public scoping
27 comments and announcing public meetings for the programmatic EA for Federal support of the
28 P2IP on February 9, 2024. The scoping period was scheduled for 30 days between February 9, 2024,
29 to March 11, 2024. In response to a public request for a comment period extension, the Co-lead
30 Agencies extended the period an additional week, to March 18, 2024. During this period, the Co-
31 lead Agencies sought public comments to determine relevant issues that could influence the scope
32 of the environmental analysis, including alternatives, and to guide the process for developing the
33 programmatic EA.

34 **1.5.2 Schedule for the Decision-Making Process**

35 The next phase of the programmatic EA process is to refine the alternatives to be analyzed in the
36 programmatic EA. These alternatives will address issues identified during scoping and will meet the

1 goals and objectives to be developed by the Co-lead Agencies' interdisciplinary team, in coordination
 2 with cooperating agencies. In compliance with NEPA, the Council on Environmental Quality
 3 regulations, and the Co-lead Agencies' regulations and guidance, alternatives should be reasonable
 4 and implementable. The Co-lead Agencies will also meet with cooperating agencies and interested
 5 Tribes to seek their input on the development of the alternatives.

6 Although the Co-lead Agencies' welcome public input at any time during the environmental analysis
 7 process, the next official public comment period will begin when Reclamation publishes the draft
 8 programmatic EA, which is anticipated in late summer 2024. The Co-leads Agencies plan to hold
 9 virtual public meetings during the draft programmatic EA comment period.

10 At the conclusion of the public comment period, the Co-lead Agencies will revise the draft
 11 programmatic EA, which will be followed by publication of the final programmatic EA. The Co-
 12 lead Agencies plan to issue the final programmatic EA and Finding of No Significant Impact
 13 (FONSI), if appropriate, in January 2025.

14 **1.5.3 Project Websites**

15 Reclamation maintains two websites at <https://www.usbr.gov/pn/programs/p2ip/index.html> and
 16 <https://www.virtualpublicmeeting.com/p2ip-salmon-reintroduction-programmatic-ea>. The websites
 17 include background documents, information on public meetings, and contact information for the
 18 Reclamation planning team. The public was invited to submit scoping comments via the virtual
 19 public meeting website, email, or by mail.

20 **1.5.4 Public Outreach and Public Scoping Meetings**

21 The Co-lead Agencies hosted two in-person public meetings during the public scoping period for
 22 the P2IP programmatic EA. **Table 1-1** summarizes the meeting locations, dates, and public
 23 attendance.

24 **Table 1-1: In-Person Public Scoping Meetings**

Location	Date	Number of Attendees
Colville Tribal Museum, Grand Coulee, Washington	February 27, 2024	9
Kalispell Northern Quest Casino, Airway Heights, Washington	February 28, 2024	8

25 The meetings were provided in an open house format with informational stations and opportunities
 26 for the public to interact with Reclamation, Bonneville, USACE, and representatives from the
 27 Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, the Coeur d'Alene Tribe
 28 and Upper Columbia United Tribes.

Chapter 2. Comment Analysis

2.1 Method of Comment Collection and Analysis

The Co-lead Agencies evaluated all written submissions received during the scoping period that were received on or before March 18, 2024. These submissions are documented in **Appendix B**.

Comment analysis is used to compile and combine similar public comments into a format that decision-makers can use to identify alternative management actions in a NEPA document. It assists the team in organizing, clarifying, and addressing technical information, in accordance with NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the NEPA process.

The process includes five main components:

- Developing a comment coding structure
- Using a comment database for comment management
- Reading and coding public comments into discrete categories
- Interpreting and analyzing the comments to identify issues and themes
- Preparing comment summaries

The Co-lead Agencies developed a comment coding structure to help sort comments into logical groups by topics and issues. The coding structure was designed to capture all comment content, rather than to restrict or exclude any ideas.

During the public scoping period, the Co-lead Agencies received 13 total comment submissions sent via the project website, mail, and email. We did not receive any written comments during the in-person public meetings. Of the total submissions, 2 were from local or state agencies, 2 were from Federal agencies, and 7 were from non-government organizations or industry groups. In total, 20 unique substantive comments were identified from the comment submissions.

Substantive comments received during the public comment period do one or more of the following:

- Raise issues the Co-lead Agencies have not considered or reinforce issues that had already been identified
- Present information that can be used when the Co-lead Agencies consider the impacts of alternatives
- Raise concerns, with reasoning, regarding public land resources in the planning area
- Question, with reasonable basis, the accuracy of information in an existing report

2.2 Comment Submission Summary

In this report, a *comment submission* refers to a unique letter, email, website entry, verbal comment, or hardcopy comment received by Reclamation during the public comment period. A *comment* refers to a substantive statement identified within the comment submission. All substantive comments identified were grouped by similar issue topics; those comments are summarized in **Chapter 3 of this report**.

Table 2-1 summarizes the distribution of comments and submissions by category. These categories are outlined further in **Chapter 3 of this report**, which presents summaries of the substantive comments included in **Appendix B of this report**.

Table 2-1: Comments by Category

Category	Number of Comments
Stakeholder relationships	5
Range of alternatives	1
Fisheries and aquatic ecosystem	3
Dam operations	2
Power generation	2
Tribal interests	1
Tribal trust assets	1
Water quality	4
Mailing list	1
Total	20

Chapter 3. Comment Themes and Summaries

Comment themes and other information collected in the early planning and scoping phases will be used to help formulate a range of reasonable alternatives for the programmatic EA that will be analyzed during the NEPA process.

The themes and summaries presented below are preliminary and are based on the best information known to date. Themes are categorized by resource areas, uses, or processes. A summary of the comments received has been developed and organized by issue categories.

The process of developing this programmatic EA will afford opportunities for collaboration with local, state, Federal, and tribal governments; land management agencies; key stakeholders; public interest groups; and public land users. As a result, refinements may be made to any issues or concerns to reflect additional public input.

The comments identified in the public's submissions are summarized in the sections below. The substantive comments have been grouped into topics and summarized to reflect how they are to be addressed by the Co-lead Agencies during the NEPA process.

3.1 Comment Themes

3.1.1 Stakeholder Relationships

Comment Summary

Commenters noted their interests or stakes in the project and requested that the Co-leads Agencies to coordinate with them during the NEPA process.

3.1.2 Range of Alternatives

Comment Summary

A commenter requested that the Co-leads Agencies include fish passage over Long Lake Dam, Little Falls Dam, and Nine Mile Dam in addition to the proposed salmon reintroduction. Fish passage would benefit the Spokane Watershed's riparian habitat, local communities' cultural identity, and local streamside restoration efforts.

3.1.3 Fisheries and Aquatic Ecosystem

Comment Summary

A commenter noted Washington Department of Wildlife requirements for fish studies, pathogen screenings, and mass markings for salmon. They also noted the potential need for the Co-leads Agencies to work with hatchery committees.

1 **3.1.4 Dam Operations (including Power Generation)**

2 **Comment Summary**

3 Commenters expressed support for the salmon reintroduction so long as operations of the Grand
4 Coulee Dam and John Keys III Pump-Generating Plant are not affected.

5 A commenter noted that the P2IP schedule overlaps with their facility maintenance and
6 modernization projects and expressed concern that the proposed P2IP may affect their Federal
7 Energy Regulatory Commission license.

8 A commenter asked the Co-leads Agencies to define a “major operational change,” in the draft
9 programmatic EA.

10 **3.1.5 Tribal Interests (including Indian Trust Assets)**

11 **Comment Summary**

12 Commenters expressed support for salmon reintroduction in historic habitats within the Columbia
13 River Basin to uphold tribal rights and assets.

14 **3.1.6 Water Quality**

15 **Comment Summary**

16 A commenter recommended that the Co-leads Agencies use the Environmental Protection Agency
17 (EPA) “How’s My Waterway” tool to identify existing water quality issues and associated restoration
18 or protection plans for the programmatic EA analysis.

19 A commenter noted that selenium pollution from coal mines in British Columbia’s Elk and
20 Kootenay River watersheds that drain to the Columbia River are exceeding water quality standards
21 and could affect the Columbia River and its salmon.

22 A commenter noted that the EPA is considering adding the northeast Washington portion of the
23 Upper Columbia River to the National Priorities List due to lead contamination; this listing could
24 benefit reintroduced salmon.

25 A commenter noted that salmon rearing facilities need to meet local water quality standards.

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Appendix A

Notification Materials: Email, Newspaper, and Postcard

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The Bureau of Reclamation, U.S. Army Corps of Engineers, and Bonneville Power Administration (collectively, the co-lead agencies) are soliciting public and agency comments to help identify issues or alternatives to be considered in the programmatic environmental assessment for Phase 2 Implementation Plan: Feasibility of Reintroduced Salmon in the Upper Columbia River Basin.

Please forward this email to anyone you think may be interested.

When: February 9, 2024, to March 11, 2024

Where: Virtual and In-Person Opportunities

Interested parties are invited to participate in the Phase 2 Implementation Plan: Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin (P2IP) project during the 30-day scoping period. The scoping period will be open from **February 9, 2024, to March 11, 2024.**

The co-lead agencies will host two in-person open-house format meetings:

- In-Person Meeting: February 27, 2024, 5-7pm Pacific Time (PT) in Grand Coulee, WA at Colville Tribal Museum
- In-Person Meeting: February 28, 2024, 6-8pm (PT) in Airway Heights, WA at Kalispell Northern Quest Casino

A virtual meeting room will be accessible 24 hours a day. Visitors can view information about the project and submit comments. You can visit the virtual meeting room at

<https://www.virtualpublicmeeting.com/p2ip-salmon-reintroduction-programmatic-ea>

This public scoping process also will meet our public involvement obligations under Section 106 of the National Historic Preservation Act. We invite your comments on the potential for this project to result in adverse effects to historic properties, if any.

For your comments to be reviewed and considered in a timely manner, we ask that comments be submitted by **March 11, 2024.** Comments specific to the proposed federal actions are most helpful. Please include your name, address, telephone number, and/or organization represented. Comments may be submitted by mail, through the virtual public meeting room or by email at bor-sha-p2ip_peaproject@usbr.gov. Written comments must be postmarked by March 11, 2024, and may be sent to Mel Yenko, Natural Resource Specialist, Bureau of Reclamation, Columbia–Pacific Northwest Regional Office, 1150 Curtis Road, Boise, ID, 83706-1234.

If you have questions about the project, please contact Mel Yenko at 208-914-0362.

Additional project information is available at

<https://www.usbr.gov/pn/programs/p2ip/index.html>.



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Programmatic Environmental Assessment for Phase 2 Implementation Plan: Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin

The Bureau of Reclamation, U.S. Army Corps of Engineers, and Bonneville Power Administration invites public and agency comments to identify issues or alternatives to be considered in the programmatic environmental assessment for the Phase 2 Implementation Plan: Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin project. There will be a 30-day public comment period from **February 9, 2024**, to **March 11, 2024**.

During this period, the public can participate in the scoping process through two, open-house format public meetings held on February 27, 2024, 5-7 pm PT in Grand Coulee, WA, at Colville Tribal Museum and February 28, 2024, 6-8 pm PT in Airway Heights, WA, at Kalispell Northern Quest Casino. During the public meetings, subject matter experts will be available to answer questions about the project.

In addition, a virtual meeting room will be accessible 24 hours a day. Visitors will be able to view information about the project and submit comments.

To view the virtual meeting room, please visit
<https://www.virtualpublicmeeting.com/p2ip-salmon-reintroduction-programmatic-ea>

This public scoping process also will meet the public involvement obligations under Section 106 of the National Historic Preservation Act. We invite your comments on the potential for this project to result in adverse effects to historic properties, if any.

Comments may be submitted via email to bor-sha-p2ip_peaproject@usbr.gov, through the virtual meeting room, during the public meetings, or by mail at the address below. For your comments to be reviewed and considered in a timely manner, we ask that comments be submitted or postmarked by March 11, 2024. Mailed comments must be postmarked by March 11, 2024, and sent to Mel Yenko, Natural Resource Specialist, Bureau of Reclamation, Columbia-Pacific Northwest Regional Office, 1150 Curtis Road, Boise ID, 83706-1234.

For more information on the project, please visit
<https://www.usbr.gov/pn/programs/p2ip/index.html>



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**U.S. Department of the Interior
Bureau of Reclamation
Columbia-Pacific Northwest Regional Office
1150 Curtis Road
Boise, ID 83706-1234**

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Programmatic Environmental Assessment for Phase 2 Implementation Plan:

Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin Project

Notice for In-Person and Tribal Citizen Public Meetings

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The Bureau of Reclamation, U.S. Army Corps of Engineers, and Bonneville Power Administration will host two public meetings for the Programmatic Environmental Assessment of the Phase 2 Implementation Plan: Testing Feasibility of Reintroduced Salmon in the Upper Columbia River Basin project. The scoping period will be open from **February 9, 2024**, to **March 11, 2024**. During this period, the public and Tribal Citizens can participate by commenting on the project and attending one of the meetings listed below.

Date	Time (Pacific Time)	Location
<i>In-Person Meeting</i> February 27, 2024	5-7pm PT	Colville Tribal Museum, Grand Coulee, WA
<i>In-Person Meeting</i> February 28, 2024	6-8pm PT	Kalispell Northern Quest Casino, Airway Heights, WA

For additional information on the project, please visit

<https://www.usbr.gov/pn/programs/p2ip/index.html>

A virtual public meeting room for this scoping effort is available at

<https://www.virtualpublicmeeting.com/p2ip-salmon-reintroduction-programmatic-ea>

Meeting dates, times, and locations are subject to change. Please check USBRs project website for updates

Appendix B

Substantive Public Comments

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Appendix B. Substantive Public Comments

Agency or Organization Name	Letter Number	Comment Number	Comment Code Name	Comment Text
Douglas County Public Utility District	3	2	Stakeholder relationships	Given our long-standing commitments to the conservation and recovery of anadromous fish at Wells Project, it is no surprise that the District has a vested interest in supporting the reintroduction of extirpated stocks into the blocked area. As such, the District welcomes and supports the NEPA process and the various permitting actions, studies, and conservation feasibility work that is necessary to complete the P2IP effort. The District will continue to work side-by-side with the UCUT tribes on implementation of the P2IP while also continuing to meet our FERC license and Wells HCP conservation requirements.
Douglas County Public Utility District	3	1	Stakeholder relationships	The District owns and operates the Wells Hydroelectric Project No. 2149 (Wells Project) located immediately downstream of the Federally owned and operated Chief Joseph and Grand Coulee dams. Due to its close proximity to these projects, the District has a vested interest in the successful reintroduction of anadromous fish into the freshwater habitat located upstream of the Federal projects. The Wells Project is currently the furthest upstream dam on the mainstem Columbia River that has volitional fish passage facilities for adult and juvenile fish. The District operates the Wells Project pursuant to the terms of a 40-year license issued by the Federal Energy Regulatory Commission (FERC) in 2012.
Washington Department of Wildlife	4	2	Stakeholder relationships	Though Washington state is not a party to the P2IP agreement between the three tribes and the Federal government, WDFW staff were involved and supportive of the agreement throughout the negotiation process, and we expect to continue to be an important partner on policy, restoration, and technical issues going forward.
Avista	5	4	Stakeholder relationships	While Avista appreciates the milestone updates we have received, we are seeking a better understanding of roles and opportunities for engagement and to be a participant in the P2IP planning, schedule, and implementation discussions.
Avista	5	1	Stakeholder relationships	Avista has a unique role as the sole owner and operator of non-Federal facilities that are expressly identified throughout the P2IP as a target for fish passage: the Little Falls, Long Lake, and Nine Mile hydroelectric facilities, located on the Spokane River. In support of ensuring the PEA is appropriately scoped and can support implementation of P2IP, we believe it is valuable for the Co-Lead Agencies to consult with Avista and share details regarding the P2IP. This engagement would help identify potential environmental and economic impacts and ongoing considerations at our facilities, as well as potential impacts to our customers. Avista's input would also help ensure the PEA adequately describes anticipated P2IP activities and impacts as contemplated by the National Environmental Policy Act (NEPA).
Save Our Wild Salmon Coalition	8	2	Fisheries and aquatic ecosystem	Additionally, we support expanding the Federal-tribal partnership in the future to include studies to assess the feasibility of reintroducing Steelhead and Pacific Lamprey into the proposed study area.
Spokane Riverkeeper	9	1	Range of alternatives	The restoration of salmon in the Upper Columbia system should include fish passage over Long Lake Dam, Little Falls Dam, and Nine Mile Dam. This will benefit the health of surface waters in the Spokane Watershed, riparian habitat and the cultural identity of local communities. Local streamside restoration efforts are underway in many local watersheds and the state and Federal dollars that accompany salmon restoration will bolster these efforts, leading to better water quality and salmon habitat. In addition, the return of salmon should give landowners another reason to join restoration efforts on their land.
Douglas County Public Utility District	3	3	Fisheries and aquatic ecosystem	The District believes that when taken together the actions of the Wells HCP and P2IP have the potential to significantly improve the abundance, range and productivity of Pacific Salmonids in the Upper Columbia River.
Washington Department of Wildlife	4	1	Fisheries and aquatic ecosystem	* WDFW Scientific Collection and Fish Transport Permits are required for studies and movement of adult and juvenile fish and gametes, respectively. * Pathogen screening as prescribed by WDFW is required prior to the distribution and release of adult and juvenile salmon or their gametes into the blocked area of the Columbia River. Pathogen screening and subsequent quarantining of adults or juveniles will be necessary prior to their distribution and release into Waters of the State. * Depending upon the Federal action(s) or Federally funded action(s), coordination with the Upper Columbia River public utility district hatchery committees may be necessary. Especially if action(s) impact hatchery mitigation programs and their corresponding monitoring and evaluation efforts occurring downstream of Chief Joseph Dam. Coordination with WDFW's hatchery committee representative is recommended. * Depending upon the Federal action(s) or Federally funded action(s), consultation with the US v. Oregon signatories is required for hatchery releases and harvest of returning adults. * Per Federal code of regulations, Federally funded juvenile releases of salmon must be externally mass marked. Mass marking plans should be coordinated and agreed to with WDFW.

Agency or Organization Name	Letter Number	Comment Number	Comment Code Name	Comment Text
Quincy Columbia Basin Irrigation District	10	1	Dam operations	As detailed in the P2IP implementation documentation, the Federal support will test the feasibility of non-listed salmon species under the Endangered Species Act Furthermore, the feasibility testing will not require operational changes to the delivery of water supplies to the CBP and QCBID, and will not impact Grand Coulee Dam and Keys Pumping Plant operations. These are critical safeguards, which QCBID urges Reclamation to continue to support and include as part of P2IP and any future agency action addressing salmon reintroduction.
EAST COLUMBIA BASIN IRRIGATION DISTRICT	11	1	Dam operations	The East Columbia Basin Irrigation District (ECBID) is one of three irrigation districts within the Bureau of Reclamation's Columbia Basin Project. As such, we receive our water supply from Lake Roosevelt via the John Keys III Pump-Generating Plant at Grand Coulee Dam. We appreciate the opportunity to comment on the scoping efforts for this project. ECBID recognizes the P2IP's commitment to utilize non-listed species for reintroduction efforts and the plan to perform salmon reintroduction efforts without impact to existing operations. We appreciate this approach and support efforts for reintroduction that proceed with these guidelines. Our specific interests are focused on operations related to CBP water deliveries and power production. ECBID joins the regional and national support for the efforts being made by the Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, Coeur d'Alene Tribe, and Upper Columbia United Tribes to test the feasibility of salmon reintroduction upstream of Chief Joseph Dam into the historic salmon habitats in the United States. We support the salmon reintroduction efforts while preserving the current operations of the river system for its other authorized uses.
Avista	5	3	Power generation	Avista looks forward to the ongoing engagement so that we can review any proposed modifications to our facilities to evaluate whether the changes can be practicably and safely constructed and operated consistent with our existing commitments and obligations, including our Federal Energy Regulatory Commission (FERC) license, which includes the Long Lake and Nine Mile hydroelectric developments. It's important for us all to keep in mind that proposed changes may necessitate a multi-year FERC license amendment at our Federally-licensed facilities, a process which includes agency consultation, public review, dam safety considerations, and FERC review and approval to construct and operate interim or permanent facilities at the projects. P2IP implementation that proposes activities and especially modifications at the dams may trigger other license-related consultation, stemming from requirements related to the National Historic Preservation Act, Clean Water Act, and additional obligations imbedded in the FERC license. In addition, Avista has planned facility maintenance and modernization projects during the entire P2IP timeframe. Avista will have to consider and coordinate these activities, several of which relate to FERC requirements. These items highlight the different context that the Co-Lead Agencies are likely considering when evaluating potential impacts to the Spokane River dams compared to the Federal mainstem Columbia dams.
Avista	5	2	Power generation	The P2IP states that it will be implemented in such a way as to not require "major operational changes" to the hydrosystem, including to power production. Defining this term in the PEA is important to ensuring the extent of potential impacts to the hydrosystem are understood and fully described. Avista can also provide additional information and feedback regarding what a "major operational change" would mean at our facilities.
Idaho Conservation League	1	1	Tribal interests	We are writing on behalf of the Idaho Conservation League (ICL) to register our support for the P2IP. The reintroduction of salmon to historic habitats in the Columbia River Basin upstream of Chief Joseph Dam and other blocked areas in the upper Columbia would ultimately serve to uphold the rights of P2IP's project proponents: the Confederated Tribes of the Colville Reservation, Spokane Tribe of Indians, Coeur d'Alene Tribe, and Upper Columbia United Tribes. The significance of salmon to these Tribal cultures cannot be overstated, and the Tribes have led the efforts to restore abundant and healthy salmon populations in the upper Columbia River Basin.
Save Our Wild Salmon Coalition	8	1	Indian trust assets	We urge the Federal Co-Leads to act in accordance with their trust and fiduciary obligations to the Tribes to fulfill the goals of the P2IP.
Idaho Conservation League	1	3	Water quality	Similarly, there is new movement to address lead and other metals generated by Teck Resources Ltd. smelter in Trail, B.C., that are polluting the Upper Columbia River. On March 5th, 2024 the U.S. Environmental Protection Agency announced its proposal to add the Upper Columbia River in northeast Washington to the National Priorities List, which would deem it eligible for cleanup financed under the Federal Superfund Program. This potential Superfund designation would also aid in safeguarding reintroduced salmon, ensuring the lead contamination that could impact fisheries is cleaned up.

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Idaho Conservation League	1	2	Water quality	As part of our work to safeguard north Idaho water, we are actively engaged with Tribes, First Nations, and other partners on both sides of the international border to reduce pollution that originates from coal mines in British Columbia's Elk and Kootenay River watersheds. Polluted water flows through the Kootenai River in Idaho, and ultimately into the Columbia River. Selenium pollution from these mines threatens the Kootenai Tribe of Idaho's efforts to restore burbot and Kootenai River white sturgeon. A recent study by the U.S. Geological Survey ¹ shows that pollution is exceeding water quality standards in the U.S. in violation of the Boundary Waters Treaty of 1909. According to lead author Meryl Storb in a Canadian Press article on November 21, 2023, "We've seen these very large increasing trends." This pollution may eventually impact the Columbia River system as well, unless the problem is addressed. On March 18th, 2024 the issue was referred to the International Joint Commission (IJC), an independent body created under the Boundary Waters Treaty to resolve transboundary water quality disputes, which has not been activated for nearly 40 years on B.C.'s shared watersheds. Our organization, along with Tribes, First Nations, the U.S. Department of State, the U.S. Department of Interior, the U.S. Environmental Protection Agency, and many others have long asked for this referral. This referral will help safeguard the vital salmon habitat in the Upper Columbia River system, which is critical to the P2IP salmon restoration effort.
US EPA Region 10	7	2	Water quality	EPA is supportive of the project's purpose to conduct salmon research and develop activities to facilitate their reintroduction into the Upper Columbia River Basin. We note that EPA's "How's My Waterway" tool may be useful in preparing the PEA for identifying existing water quality issues and associated restoration/protection plans.
Spokane Riverkeeper	9	2	Water quality	We understand that salmon recovery in an area with no native brood stocks requires rearing facilities that acclimate juvenile salmon so they can migrate back to their natal waters. It is important that these facilities have the highest level of water treatment, not further pollute our streams and rivers and meet all local water quality standards.
US EPA Region 10	7	1	Mailing list	For future correspondence on this project (e.g., releasing the PEA for comment), can you add my email and R10-NEPA@epa.gov to your distribution list?

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