Klickitat Hatchery Spring Chinook Upgrades
Public Comments on the Draft EA

1.1 COMMENTS RECEIVED

BPA received five comments during the Draft EA review period from April 10 through May 9, 2023. This section contains transcriptions of each of the five comments received. Individual concerns, questions, and opinion statements were isolated from each comment and addressed in the following section.

Comment No.	Name	Organization	Full Comment Text
ECF-423 0001	Charles Pace	Private Citizen	1. Supporting the 2008 accords, as extended, is as big a farce as the USA clinging to its use of force authorization to continue undeclared wars abroad for decades. It will be interesting to see how long BPA and the tribal extortionists will be able to keep this charade going, i.e., monetizing BPA s statutory obligations under the Endangered Species Act by bribing tribes disguised as never-ending settlement discussions carried out under the continuing jurisdiction of the District Court of Oregon, which is neither a competent nor impartial jurisdiction, and laundered thru the Northwest Power Councils parasitic fish and wildlife program. I doubted this could be maintained for even one year, but I was not factoring in a crooked federal court. This wire job has been run on the ratepayers now for 15 years and it has become the permanent basis for pursuit of survival and recovery goals. Not surprisingly, under the 2008 Accords as extended, average 10-year fish returns have declined precipitously. This year and last, they absolutely plummeted. This sorry state of affairs is actually a very good thing. It means that the tribes can extort more money for rate payers in order to rescue the remnants of salmon and steelhead populations ... provided they go nowhere near operation of mainstem projects and, most especially, integration of wind generation by using the FCRPS as a battery backup. You want to keep the fish right on the brink of extinction. There is no other way to keep the money coming. 3. The EA says that residences are located on the south side of the complex for hatchery personnel and their families. These

Comment No.	Name	Organization	Full Comment Text
			average a modest 1,054 square feet each, are one-story wood frame houses with an attached one-car garage built in the early 1950s. None of the residences comply with the ADA and have not been renovate since they were built in the 1950s. So nowadays ratepayers are on the hook via the Power Act to fund two new residences for politically aligned cronies, which will be constructed according to code related to ADA. This is another wholesale violation of statutory requirements, this time the violation is of the Power Acts in lieu prohibitions. Shut the front door! I can think of three parties who are responsible for funding these facilities. Ratepayers are not one of the parties. In fact, ratepayers are not even on the long list of responsible parties. That, of course, means absolutely nothing. This is essential to maintaining the shut the front door treaty tribes. As Judge Simon said, the bi-op is b--------, everybody knows it, and the only point is to keep the money coming.
ECF-423 0002	Jake Segovia	Private Citizen	Hello, In the current environmental impact statement, it says that construction would have little impact of geology and soils. The creation of a pipeline for the new facility will cause erosion though will be mitigated. What isn't stated is the possibility of sedimentation entering the waterways. Seeing that this is a fishery and water quality is paramount to it. What procedures are in place to mitigate this? Another aspect I noticed was the increase of chinook from current 600,000 to 800,000 goal with this facility. What is the historical average for the river? Will this increase have a detrimental effect on the rivers ecosystem? Thank you for your time
ECF-423 0003	Lloyd Stevens	WA Department of Ecology	Dear WDFW SEPADesk: Thank you for the opportunity to comment on the Determination of Non Significance for the Klickitat Hatchery Spring Chinook Upgrades. We have reviewed the documents and have the following comments.

Comment No.	Name	Organization	Full Comment Text
			WATER QUALITY Project with Potential to Discharge Off-Site If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days. The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction. In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action. More information on the stormwater program may be found on Ecology's stormwater website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/. Please submit an application or contact Lloyd Stevens Jr. at the Dept. of Ecology, (509) 571-3866, with questions about this permit. Sincerely, Joy Espinoza Central Region Director's Assistant for Lucila Cornejo
ECF-423 0004	Emily Good	EPA Region 10	Dear Carolyn Sharp: The U.S. Environmental Protection Agency has reviewed Bonneville Power Administration's Klickitat Hatchery Upgrade Draft Environmental Assessment (CEQ Number DOE/EA-2207, EPA Project Number 23-0016-BPA). EPA has conducted its review

Comment No.	Name	Organization	Full Comment Text
			pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement. The DEA evaluates the potential environmental impacts associated with hatchery facility upgrades to support increased spring Chinook salmon production and diverse genetic divergence in the Klickitat River Basin fish population in Klickitat County, Washington. In the No Action Alternative, facility operations would continue without improvements. The proposed action upgrades to the Klickitat Hatchery to meet the needs of holding and spawning adult Chinook salmon. EPA supports BPA's efforts to improve fish population health and appreciates collaboration with the Yakama Nation on the Washington Department of Fish and Wildlife. We also recognize utilization of EPA's EJScreen tool to identify communities with potential EJ characteristics in the project area. The DEA states that air quality impacts due to the proposed action are short-term, adverse, and low impact due to heavy construction equipment that produce diesel emissions and generates dust.1 EPA recommends the Final EA quantify estimated number of vehicles and number of trips during the construction phase. Include plans to monitor air quality conditions in the project area during the construction phase and modify project activities to ensure that localized air quality impacts do not exceed standards. Due to the proximity of the project to and the work in conjuncture with the Yakama Nation, EPA recommends the FEA include: a description of local and traditional knowledge concerning the affected environment, current or future impacts from the project, and historical land use and fishery knowledge, including Indigenous Traditional Ecological Knowledge. Thank you for the opportunity to review the DEA for this project. If you have questions about this review, please contact Emily

Comment No.	Name	Organization	Full Comment Text
			Good of my staff at 208-860-5517 and good.emily@epa.gov or me, at (206) 553-1774 or at chu.rebecca@epa.gov. Sincerely, Rebecca Chu, Chief Policy and Environmental Review Branch
ECF-423 0005	Donald Starkin	Private Citizen	1) What is the status of the wild Spring Chinook in the Klickitat basin? 2) What are past wild Spring Chinook population estimates and have they shown any increase in population density since hatchery operations began? 3) Are there site-specific examples of integrated wild Spring Chinook bloodstock programs that recovered wild populations and were then terminated due to their success upon which this program is based, if any? 4) What percentage (%) of the existing wild Spring Chinook will be used in the integrated program? 5) What are the probabilities' that the wild Spring Chinook could go extinct because of implementing the proposed integrated program? 6) How would the wild Spring Chinook population respond if all hatchery plants of Spring Chinook were ceased? 7) Science reviews of past efforts using bloodstock recovery programs have shown negative impacts to native populations. How will this program be any different? 8) What are the effects that Spring Chinook hatchery smolts have on ESA listed wild Steelhead populations? 9) Are off site acclimation ponds being used and if so, where will they be placed? 10) Is water quality affected is and where the acclimation sites are located?

Comment No.	Name	Organization	Full Comment Text
			11) Do these acclimation sites have any negative effects to wild fish populations where they are placed? 12) To what degree do sport, commercial and tribal fisheries impact wild Spring Chinook recovery? 13) During the construction phase, what efforts will be made to mitigate stormwater runoff? Are permits required? 14) Considering climate change, how will an increase hatchery production better survive and navigate increased water temperatures in the Columbia River and the Pacific Ocean? 15) Has any thought been given to the food supply in the Pacific Ocean and is it ample to support this increase in production? 16) If this proposed action fails to increase native wild stocks are there any back-up plans? I totally support tribal treaty fishing rights.

1.2 COMMENT RESPONSES

BPA identified isolated concerns, questions, and opinion statements from the submitted comments and provided responses in the following table.

Comment No.	Comment	Response
ECF-423 0001- 1	Supporting the 2008 accords, as extended, is as big a farce as the USA clinging to its use of force authorization to continue undeclared wars abroad for decades. It will be interesting to see how long BPA and the tribal extortionists will be able to keep this charade going, i.e., monetizing BPA s statutory obligations under the Endangered Species Act by bribing tribes disguised as never-ending settlement discussions carried out under the continuing jurisdiction of the District Court of Oregon, which is neither a competent nor impartial jurisdiction, and laundered thru the Northwest Power Councils parasitic fish and wildlife program.	Thank you for your comment. BPA appreciates its Accords relationships and the work accomplished under these agreements.
ECF-423 0001-2	The EA says that residences are located on the south side of the complex for hatchery personnel and their families…This is another wholesale violation of statutory requirements, this time the violation is of the Power Acts in lieu prohibitions.	Thank you for your comment. BPA continues to comply with the Northwest Power Act, including all in-lieu prohibitions.
ECF-423 0002-01	What isn't stated is the possibility of sedimentation entering the waterways. Seeing that this is a fishery and water quality is paramount to it. What	Potential impacts to water quality are discussed in Section 3.4.2.2. The selected contractor would be required to implement and maintain approved construction, temporary erosion, and sediment controls; a

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	procedures are in place to mitigate this?	spill response plan; and a stormwater pollution prevention plan for the duration of the project to mitigate any potential impact from sediment and other pollutants entering the Klickitat River.
ECF-423 0002-02	Another aspect I noticed was the increase of chinook from current 600,000 to 800,000 goal with this facility. What is the historical average for the river? Will this increase have a detrimental effect on the river's ecosystem?	Natural populations of anadromous fish, including spring Chinook have declined for decades in the Klickitat subbasin. The proposed increase in hatchery production was analyzed in the most recent Hatchery and Genetic Management Plan (HGMP), which includes the program's relationship to habitat protection and recovery strategies and analyzes ecological interactions. Additional detail on the effects of the transition from a segregated to an integrated program can be found in the HGMP (Yakama Nation 2019). The proposed facility upgrades were not found to have detrimental effects to existing aquatic habitat in the vicinity of the hatchery, as discussed in Sections 3.6.2 and 3.7.2.
ECF-423 0003-1	If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction, and utility placements. Obtaining a permit may take 38-60 days.	The selected construction contractor would be responsible for obtaining and complying with necessary permits, including a NPDES Construction General Permit. This measure is included in Section 2.4 of the Final EA.

Comment No.	Comment	Response
ECF-423 0003-2	The [NPDES Construction Stormwater General Permit] permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff.	A Stormwater Pollution Prevention Plan would be prepared by the construction contractor, as described in Section 2.4 of the Final EA.
ECF-423 0003-3	Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.	BPA would direct the construction contractor to comply with all proposed mitigation measures, including stormwater and erosion control measures. Section 2.4 also indicates that the construction contractor would inspect controls regularly throughout the project.
ECF-423 0004-1	EPA supports BPA's efforts to improve fish population health and appreciates collaboration with the Yakama Nation and the Washington Department of Fish and Wildlife.	Thank you for your comment.
ECF-423 0004-2	We [EPA] also recognize utilization of EPA's EJScreen tool to identify communities with potential EJ characteristics in the project area.	Thank you for your comment. BPA has also updated Section 4.0 the EA to reflect the latest guidance on analyzing impacts to communities of environmental justice concern consistent with Executive Order 14096.
ECF-423 0004-3	EPA recommends the Final EA quantify estimated number of vehicles and number of trips during the construction phase. Include plans to monitor air	BPA has updated the Final EA to include estimations on vehicle trips during construction as requested in Section 3.10.2. BPA would direct the construction

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	quality conditions in the project area during the construction phase and modify project activities to ensure that localized air quality impacts do not exceed standards.	contractor to comply with all applicable regulations concerning air pollution control during construction, as stated in Section 2.4.
ECF-423 0004-4	Due to the proximity of the project to and the work in conjuncture with the Yakama Nation, EPA recommends the Final EA include: a description of local and traditional knowledge concerning the affected environment, current or future impacts from the project, and historical land use and fishery knowledge, including Indigenous Traditional Ecological Knowledge.	Throughout the development of this project and EA, BPA has worked closely with the Yakama Nation and incorporated indigenous knowledge in alternatives development, resource descriptions (including land use, cultural resources, and fisheries knowledge), and conservation and mitigation measures. BPA committed to transparent cooperation with the Yakama Nation throughout project planning and implementation through a 2021 Memorandum of Agreement. The Final EA is representative of local and traditional knowledge since it was written in partnership with and reviewed by Yakama Nation. Federal regulations concerning indigenous and traditional knowledge considered during the development of the EA are included in Chapter 4. BPA would continue to work closely with Yakama Nation throughout the implementation of the project.
ECF-423 0005-1	What is the status of the wild Spring Chinook in the Klickitat basin?	As described in Section 3.6.1, the Klickitat spring Chinook population is not listed under the Endangered Species Act. It is considered a depressed population by WDFW due to chronically low adult returns.

Comment No.	Comment	Response
ECF-423 0005-2	What are past wild Spring Chinook population estimates and have they shown any increase in population density since hatchery operations began?	Section 3.6.1 discusses the fish species present in the project area including spring Chinook. Hatchery operations information and past spring Chinook stock assessments can be found in the 2018 Spring Chinook Master Plan (Yakama Nation 2018). Population data in the Master Plan is provided dating back to brood year 1984. On average, the Klickitat spring Chinook run comprises approximately 75% hatchery and 25% natural fish. The data show that over this period, spring Chinook adult production averaged 762 fish, ranging from 54 to 2,365.
ECF-423 0005-3	Are there site-specific examples of integrated wild Spring Chinook bloodstock programs that recovered wild populations and were then terminated due to their success upon which this program is based, if any?	A full analysis of the hatchery transition process, including a review of risks, benefits, and ecological context for the spring Chinook program transition is included in the 2018 Spring Chinook Master Plan (Yakama Nation 2018).
ECF-423 0005-4	What percentage (%) of the existing wild Spring Chinook will be used in the integrated program?	According to analysis of the transition to an integrated program in the 2018 Spring Chinook Master Plan (Yakama Nation 2018). Phase I of the program would result in an annual collection rate of above 14% of the natural population for broodstock.
ECF-423 0005-5	What are the probabilities' that the wild Spring Chinook could go extinct because of implementing the proposed integrated program?	As described in Section 3.6.2, Yakama Nation anticipates an increased recruit performance for both natural production and hatchery program fish following the transition to an integrated program supported by the proposed facility upgrades discussed in the EA. Based on analysis completed by Yakama Nation for the latest HGMP revisions, the increase in production and release of spring Chinook smolts that would result from increased hatchery

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		capacity is anticipated to increase the viability of the natural fish population in the Klickitat River and help prevent population extinction.
ECF-423 0005-6	How would the wild Spring Chinook population respond if all hatchery plants of Spring Chinook were ceased?	The closure of the Klickitat Hatchery is not an alternative considered in this environmental assessment because even without BPA funding of the facility improvements the Klickitat Hatchery would continue to operate through other funding sources. BPA is responding to a specific funding request from Yakama Nation for capital improvements that support the spring Chinook program (see Sections 1.4 and 1.5). An alternative that considered ceasing the operations and maintenance of this facility is outside the scope of this EA.
ECF-423 0005-7	Science reviews of past efforts using bloodstock recovery programs have shown negative impacts to native populations. How will this program be any different?	A full analysis of the hatchery transition process, including a review of risks, benefits, and ecological context for the spring Chinook program transition is included in the 2018 Spring Chinook Master Plan (Yakama Nation 2018). The Master Plan approach to segregated programming is consistent with direction from the Hatchery Scientific Review Group of the Northwest Power and Planning Council. The Master Plan includes annual monitoring and evaluation of natural and hatchery origin fish to determine if objectives are being met and to adaptively manage the hatchery stocks.

Comment No.	Comment	Response
ECF-423 0005-8	What are the effects that Spring Chinook hatchery smolts have on ESA listed wild Steelhead populations?	Anticipated effects of the proposed action on ESA-listed fish are described in Section 3.6.2 of the EA. ESA considerations are also described in Table 4-1. Additional information on the effects of production of spring Chinook smolts can be found in the Environmental Impact Statement (NMFS 2014) and Biological Opinion (NMFS 2018) prepared by NMFS associated with their funding of operations and maintenance of hatchery programs in the Columbia River Basin under the Mitchell Act, including the Klickitat Hatchery.
ECF-423 0005-9	Are off site acclimation ponds being used and if so, where will they be placed?	No. Use and construction of offsite acclimation ponds are not proposed in this EA.
ECF-423 0005-10	Is water quality affected is and where the acclimation sites are located?	Potential impacts to water quality are discussed in Section 3.4.2.2. Use and construction of offsite acclimation ponds are not proposed in this EA.
ECF-423 0005-11	Do these acclimation sites have any negative effects to wild fish populations where they are placed?	Use and construction of offsite acclimation ponds are not proposed in this EA.
ECF-423 0005-12	To what degree do sport, commercial and tribal fisheries impact wild Spring Chinook recovery?	Recreational, commercial, and tribal fishery harvests as they pertain to the proposed facility upgrades are discussed in Sections 3.6, 3.8, and 3.15. The increased production supported by the upgrades would yield an annual harvest of 1,200 spring Chinook for sport or recreational purposes. Additional analysis on the relationship between commercial, recreational and tribal harvests and the spring Chinook program can be found in the 2018 Spring Chinook Master

Comment No.	Comment	Response
		Plan (Yakama Nation 2018). For additional information on harvest, please see NOAA Fisheries' Environmental Impact Statement for Programmatic Review of Harvest Actions for Salmon and Steelhead in the Columbia Basin related to U.S. v. Oregon (NMFS 2014) and the associated Biological Opinion (NMFS 2018).
ECF-423 0005-13	During the construction phase, what efforts will be made to mitigate stormwater runoff? Are permits required?	Mitigation measures can be found in Section 2.4. The construction contractor would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) and comply with the National Pollution Discharge and Elimination System (NPDES) General Permit for construction activities. Best Management Practices may include installation of silt fences, straw wattles, and jute matting, conducting ground-disturbing construction activities during the dry season, and implementing a revegetation plan to restabilize soils.
ECF-423 0005-14	Considering climate change, how will an increase hatchery production better survive and navigate increased water temperatures in the Columbia River and the Pacific Ocean?	Potential impacts from the proposed facility upgrades related to climate change and greenhouse gases are described in Section 3.11 and 3.16.12 of the EA The facility upgrades would increase health and resiliency of the native spring Chinook population in a changing climate through improved hatchery conditions. For additional information on hatchery fish and climate change, please see the Mitchell Act EIS, Chapter 5, Cumulative Effects available online at https://media.fisheries.noaa.gov/2021-11/mitchell-act-hatcheries-feis-final.pdf.

Comment No.	Comment	Response
ECF-423 0005-15	Has any thought been given to the food supply in the Pacific Ocean and is it ample to support this increase in production?	Food supply in the Pacific Ocean is outside the scope of this EA. The purpose and need for the proposed facility upgrades are described in Sections 1.4 and 1.5. BPA is responding to a specific funding request from Yakama Nation for capital improvements that support the spring Chinook program (see Sections 1.4 and 1.5).
ECF-423 0005-16	If this proposed action fails to increase native wild stocks are there any back-up plans?	The Klickitat Hatchery spring Chinook production program is funded through NMFS under the Mitchell Act to provide for the conservation of fisheries resources in the Columbia River Basin. Additional information on hatchery production alternatives and effects can be found in the Environmental Impact Statement (NMFS 2014) and Biological Opinion (NMFS 2018) prepared by NMFS associated with that funding. The Klickitat Hatchery Spring Chinook Master Plan[1] describes the various management strategies that have been considered to achieve conservation and harvest objectives and the risks associated with each option. The Proposed Action in this EA focuses on the transition from a segregated to integrated program as described in the Master Plan and HGMP, in which program will be managed to increase the viability of the natural population while simultaneously producing the adults needed to meet harvest objectives.
ECF-423 0005-17	I totally support tribal treaty fishing rights.	Thank you for your comment.

References Cited in Comment Responses:

National Marine Fisheries Service (NMFS). 2014. Final Environmental Impact Statement to Inform Columbia River Basin Hatchery Operations and the Funding of the Mitchell Act Hatchery

Programs. (https://www.fisheries.noaa.gov/resource/document/final-environmental-impact-statement-inform-columbia-river-basin-hatchery). Accessed June 20, 2023.

National Marine Fisheries Service (NMFS). 2017 Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat (EFH) Consultation NOAA's National Marine Fisheries Service's implementation of the Mitchell Act Final Environmental Impact Statement preferred alternative and administration of Mitchell Act hatchery funding. (https://media.fisheries.noaa.gov/dam-migration/mitchell-act_opinion_011517.pdf). Accessed June 20, 2023.

Yakama Nation. 2018. Klickitat River Spring Chinook Master Plan. Prepared in cooperation with Washington Department of Fish and Wildlife. Yakama Nation, Toppenish, WA.

Yakama Nation. February 2019. Klickitat Spring Chinook: Integrated Program Description, Analysis, and Implementation Schedule. Yakama Nation, Toppenish, WA. 30 pages.

APPENDIX B: FINAL DESIGN PLANS

Appendix B on the following 10 pages contains the final design plans for the facility upgrades described in the Proposed Action.