**Proposed Action:** Continued Funding to Pacific States Marine Fisheries Commission and United States Fish and Wildlife Service for Ongoing Comparative Survival Study

**Project No.:** 1996-020-00

**Project Manager:** Tracy Hauser, EWL - 4

**Location:** Columbia and Snake Rivers and their tributaries in Idaho, Oregon and Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B3.3 – Research related to conservation of fish and wildlife

**Description of the Proposed Action:** BPA proposes to continue funding the Pacific States Marine Fisheries Commission (PSMFC) and U.S. Fish and Wildlife Service (USFWS) for ongoing work on the Comparative Survival Study (CSS) in the Columbia River Basin. The CSS is a management-oriented, large scale, life-cycle monitoring study of spring/summer/fall Chinook, steelhead, and sockeye, utilizing Passive Integrated Transponder (PIT) tags.

The CSS was designed to address several basin-wide monitoring needs and to provide demographic and other data for Snake River and Columbia River wild and hatchery salmon and steelhead populations. These activities assist in determining survival through the Columbia River System and enable biologists to monitor population trends over time. Monitoring survival probability over the entire life-cycle can help identify where survival bottlenecks are occurring, which is critical input for informed management decisions (Good et al. 2007). The CSS also examines environmental factors associated with life-cycle survival probability and evaluates the hypothesized mechanisms for variations in those probabilities.

While the majority of fish tagged are of hatchery-origin, an overall goal of CSS is to emphasize marking wild fish and to mark wild populations as representatively as possible. Wild and hatchery smolts are marked with glass-encapsulated PIT tags that are 11-12 mm in length and have a unique code to identify individual fish. These PIT tags are implanted into the fish’s body cavity using a hand-held syringe, and they are generally retained and function throughout the life of the fish.

Marking operations to support the CSS are carried out across the Columbia River Basin, at existing hatchery facilities and field sites, with support from the Idaho Department of Fish and Game (IDFG), Washington Department of Fish and Wildlife (WDFW), Oregon Department of Fish and Wildlife (ODFW), the Confederated Tribes of the Umatilla Indian Reservation (CTUIR), and the Nez Perce Tribe (NPT). These organizations are subcontractors under the PSMFC.

Below is the breakdown of each respective support organization.
The IDFG would mark natural-origin and hatchery-origin salmon and steelhead in multiple river basins in Idaho. These include:

- 275,400 hatchery-origin steelhead, Chinook, and sockeye
- 52,200 natural-origin steelhead and Chinook

The WDFW would mark natural-origin and hatchery-origin salmon and steelhead in multiple river basins in Washington. These include:

- 2,000 hatchery-origin steelhead
- 31,500 natural-origin steelhead and Chinook

The ODFW would mark natural-origin and hatchery-origin salmon and steelhead in multiple river basins in Oregon. These include:

- 56,000 hatchery-origin steelhead and Chinook
- 3,600 natural-origin steelhead and Chinook

The CTUIR would mark natural-origin steelhead and Chinook:

- 2,400 natural-origin steelhead and Chinook

The NPT would mark hatchery-origin steelhead and Chinook:

- 63,150 hatchery-origin Chinook

Funding the proposed activities fulfills commitments under the 2020 National Marine Fisheries Service Columbia River System Biological Opinion (2020 NMFS CRS BiOp). These actions would support conservation of ESA-listed species considered in the 2020 ESA consultation with the United States Fish and Wildlife Service on the operations and maintenance of the Columbia River System, while also supporting ongoing efforts to mitigate for effects of the FCRPS on fish and wildlife in the mainstem Columbia River and its tributaries pursuant to the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act) (16 U.S.C. (USC) 839 et seq.).

**Findings:** In accordance with Section 1021.410(b) of the Department of Energy’s (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
3) has not been segmented to meet the definition of a categorical exclusion.
Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Mandy Hope  
Mandy Hope  
Contract Environmental Protection Specialist  
ACS Professional Staffing  

Reviewed by:

/s/ Chad Hamel  
Chad Hamel  
Supervisory Environmental Protection Specialist  

Concur:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer  

Attachment(s): Environmental Checklist
Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

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**Project Site Description**

All activities would occur at either existing hatchery facilities or field sites associated with tributaries to the Columbia and Snake rivers in Idaho, Oregon, and Washington.

**Evaluation of Potential Impacts to Environmental Resources**

1. **Historic and Cultural Resources**
   
   Potential for Significance: No
   
   **Explanation:** There are no ground-disturbing activities, thus the proposed activities do not have the potential to affect historic properties or cultural resources. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

2. **Geology and Soils**
   
   Potential for Significance: No
   
   **Explanation:** No ground-disturbing activities proposed, thus the proposed activities do not have the potential to affect geology and soils. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

3. **Plants (including Federal/state special-status species and habitats)**
   
   Potential for Significance: No
   
   **Explanation:** No ground-disturbing or vegetation removal activities proposed. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

4. **Wildlife (including Federal/state special-status species and habitats)**
   
   Potential for Significance: No
   
   **Explanation:** No ground-disturbing or other activity that may affect wildlife or wildlife habitat is proposed. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

5. **Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)**
   
   Potential for Significance: No
   
   **Explanation:** PIT tagging hatchery-origin and wild-origin anadromous salmonids is a common and wide-spread activity within the Columbia River basin; the majority of fish tagged are
hatchery-origin fish. Since these activities are requirements in the 2020 NMFS CRs BiOp, NOAA Fisheries annually issues a Determination of Take Memorandum describing the maximum number of individual ESA-listed fish may be tagged in a given year—the number of fish tagged in support of the Comparative Survival Study is well below that threshold.

There would be no impact to adjacent waterbodies or floodplains because no ground disturbing activities are proposed. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

6. **Wetlands**

Potential for Significance: No

**Explanation:** No ground-disturbing activities are proposed thus the action does not have the potential to impact wetlands. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

7. **Groundwater and Aquifers**

Potential for Significance: No

**Explanation:** No ground-disturbing activities are proposed thus the action does not have the potential to impact wetlands. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

8. **Land Use and Specially-Designated Areas**

Potential for Significance: No

**Explanation:** No ground-disturbing activities that may affect groundwater or aquifers are proposed. All work would be carried out from within existing facilities or at mobile PIT tagging trailers.

9. **Visual Quality**

Potential for Significance: No

**Explanation:** All work would be carried out from within existing facilities or at mobile PIT tagging trailers. Access to field sites is on existing road networks and all activities are compatible with local land use.

10. **Air Quality**

Potential for Significance: No

**Explanation:** All work would be carried out from within existing facilities or at mobile PIT tagging trailers and has no effect to visual quality. The mobile PIT tag trailers would access field sites on existing roads and remain parked temporarily. Any change to the viewshed would be short-term and temporary.

11. **Noise**

Potential for Significance: No

**Explanation:** All work would be carried out from within existing facilities or at mobile PIT tagging trailers and would have no effect on air quality. Any increase in emissions from vehicles accessing field sites would be very minor and short term.
12. Human Health and Safety

Potential for Significance: No

Explanation: All work would be carried out from within existing facilities or at mobile PIT tagging trailers and would not result in an increase in ambient noise at PIT tagging locations.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation: N/A

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation: N/A

Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.

Explanation: N/A

Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation: N/A

Landowner Notification, Involvement, or Coordination

Description: No notification – All work is at existing facilities or at mobile facilities accessed on existing roads on public lands.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.
Signed: /s/ Mandy Hope ___________________________ April 13, 2021  
Mandy Hope, ECF -4  
Contract Environmental Protection Specialist  
ACS Professional Staffing