

memorandum

DATE: July 29, 2009

REPLY TO
ATTN OF: KEC-4

SUBJECT: Supplement Analysis for the Proposed Lyle Falls Fish Passage Project (DOE/EIS-0397/SA-001)

TO: Mary Todd Haight
Fish and Wildlife Project Manager (KEWL-4)

Proposed Action: Revisions to the Lyle Falls Fish Passage Project

Project Number: 1988-115-35

Location: At the existing Lyle Falls Fishway facility; mile 2.2 on the Klickitat River in Klickitat County, WA; T03N, R12E, Sec. 25 NWSW and SWNW

Proposed by: Bonneville Power Administration (BPA), in cooperation with the U.S. Forest Service (USFS), Washington Department of Fish and Wildlife (WDFW), and Yakama Nation (YN)

Description of the Proposed Action: BPA and its cooperating agencies completed the Lyle Falls Fish Passage Project Final Environmental Impact Statement (FEIS) in November 2008. Subsequently, BPA completed a Record of Decision (ROD) for the project in February 2009 documenting BPA's decision to fund modifications to the existing Lyle Falls Fishway on the lower Klickitat River to improve fish passage for spring and fall Chinook salmon, Coho salmon, steelhead trout, Pacific lamprey and bull trout to the upper part of the Klickitat River watershed. In addition to improving fish passage, the modifications facilitate fish data collection, sampling, and monitoring of biological information for fishery management.

On April 23, 2009, the YN proposed revisions to the site plan analyzed in the FEIS. The proposed revisions are the result of further consultation with National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries), Klickitat Public Utility District (PUD), tribal fishermen, and other refinements that typically occur when finalizing project design. The site plan revisions are described in detail in Attachment 1.

Analysis: Attachment 1 discloses anticipated effects of the revisions in comparison to the project design that was evaluated in the FEIS in order to determine whether a Supplemental EIS is needed for the Lyle Falls Fish Passage Project. Specifically:

- The fish passage and handling facility designs were modified to comply with updated NOAA Fisheries fish passage guidelines for fish listed under the Endangered Species Act (ESA) and will reduce fish mortality from handling.
- No changes to the project alter the findings of the Section 106 cultural resource consultation with the Washington State Historic Preservation Office.
- The USFS concluded June 5, 2009 that the proposed project changes are an improvement over the original proposal and well within the effects evaluated under their original Wild and Scenic River consistency determination of November 5, 2008, and that no modifications or updates to it are warranted.
- There will be no changes to effects on ESA species and no additional conservation measures are necessary.

- No substantially different impacts will affect wildlife, wildlife movements, population sizes, or ecological interactions.
- Relocation of the transportation channel (fishway) farther away from the Klickitat River could result in fewer impacts to the river and to fish.
- Relocation of the Klickitat PUD power pole moves the overhead power lines from above the fish handling area and reduces utility trenching.
- The additional fishermen's parking area and rock walkway from the parking lot facilitates access by tribal fisherman to the traditional dipnet sites near the fishway entrance.

Findings: The revisions to the Lyle Falls Fish Passage Project and the environmental impacts that would arise from them are closely related to the actions and impacts examined in BPA's Fish and Wildlife Implementation Plan EIS (DOE/EIS-0312, April 2003), the Lyle Falls Fish Passage Project EIS, and the Lyle Falls Fish Passage Project ROD. This Supplement Analysis finds that: 1) implementing the proposed action will not result in any substantial changes to the Lyle Falls Fish Passage Project that are relevant to environmental concerns; and 2) there are no significant new circumstances or information relevant to environmental concerns and bearing on the Lyle Falls Fish Passage Project or its impacts. Therefore, no further NEPA documentation is required.

/s/ Nancy H. Weintraub

Nancy H. Weintraub
Senior Environmental Protection Specialist

CONCUR:

/s/ Katherine S. Pierce

Katherine S. Pierce
NEPA Compliance Officer

DATE: July 29, 2009

Attachment 1:

Effects Analysis of Revisions to the Lyle Falls Fish Passage Project

cc: (w/ attachment 1)

Mr. Bill Sharp – Yakima Nation
Mr. Daniel Harkenrider – USFS CRGNSA
Ms. Sue Baker – USFS
Mr. John Easterbrooks – WDFW

Attachment 1

Effects Analysis of Revisions to the Lyle Falls Fish Passage Project

Introduction

The Lyle Falls Fish Passage Final Environmental Impact Statement (FEIS) (DOE/EIS-0397) was completed and released by Bonneville Power Administration (BPA) and its cooperating agencies in November 2008. The FEIS identified the proposed action as both the preferred alternative and the environmentally preferable alternative. In a February 2009 Record of Decision (ROD), the BPA Administrator announced his decision to implement the preferred alternative, funding fish passage improvements at the Lyle Falls fishway. Since that time, the Confederated Tribes and Bands of the Yakama Nation (YN) has worked with the National Marine Fisheries Service (NOAA Fisheries) to finalize design on the project, Klickitat Public Utility District (PUD) has determined electrical power needs, and YN tribal members have determined the best access to tribal fishing areas. These discussions have resulted in proposed revisions to the Lyle Falls Fish Passage Project (project) site plan. These revisions were shared with BPA during a site visit to the project on April 23, 2009. The revised site plan includes several changes from what was evaluated in the FEIS.

In accordance with the procedural requirements of the National Environmental Policy Act (NEPA), BPA is required to prepare a supplemental EIS if there are substantial changes to the proposal or significant new circumstances or information relevant to environmental concerns. Criteria for determining the need for a supplemental EIS are specified in the Council of Environmental Quality Regulations Implementing NEPA (40 CFR. 1502.9 (c)). In accordance with DOE NEPA Regulations (10 CFR 1021.314 (c)), BPA has prepared this Supplemental Analysis (SA) to determine if a supplemental EIS is required for the project.

The documentation below outlines the site plan changes since the FEIS, explains the reasoning and justification for the site plan revisions, and examines the anticipated effects when compared with the project evaluated in the FEIS. This comparative analysis will be used to determine whether the existing EIS needs to be supplemented, a new EIS should be prepared, or no further NEPA documentation is required.

Project Components Described in the FEIS

The YN requested funding from BPA to modify the existing Lyle Falls fishway. The following objectives were identified in the EIS for this project:

- 1) Provide properly functioning and effective year-round adult fish passage facilities that would be consistent with current state and federal fish passage standards and criteria,
- 2) Provide more efficient facilities to collect, monitor, and enumerate biological information that could provide a foundation for effectively monitoring success of fishery management actions in the subbasin, and
- 3) Enhance opportunities for adult salmonids to access the upper Klickitat River and make use of abundant, available, and under-utilized spawning and rearing habitat and provide nutrient enhancement to the watershed.

The modifications to the fishway evaluated in the EIS included the following major actions:

- Extend the existing concrete fishway approximately 330 feet farther upstream,
- Construct a new fish exit structure and water supply intake at that point,
- Modify the downstream fishway entrance,
- Develop a new attraction flow system, and
- Provide an improved fish enumeration facility by installing a Passive Interrogative Transponder (PIT) tag detection station and fish video monitoring device.

Additional project features associated with the proposed action and addressed in the EIS were:

- Construction of a coded-wire tag detection system,
- Installation of an infrared video system,
- Construction of a permanent storage and equipment building,
- Improved road access to the ladder,
- A rock disposal site for material removed during fish ladder modifications, and
- A new transformer on an existing overhead PUD power pole to provide a power source to the fish ladder.

Proposed Site Plan Changes

Proposed changes to the site plan as a result of working with Tribal members, regulatory agencies, and the PUD are listed below.

- 1) Additional road and parking expansion near the storage and equipment building,
- 2) Additional fishermen's parking area and rock walkway from the parking lot to the dipnet sites near the fishway entrance,
- 3) New fish lift reservoir building to supply water for operating the fish lift (approximately 30 feet wide by 39 feet long, positioned to minimize visual effect),
- 4) Newly located underground vault and manhole structures and utilities,
- 5) New alignment of the overhead electrical service and relocation of one existing power pole,
- 6) Revised location of the 40-foot-long by 24-foot-wide equipment control building,
- 7) A vault toilet building (17 feet long by 12 feet wide by 12 feet tall),
- 8) Relocation of the transportation channel, and
- 9) Relocation of the transportation channel access road.

The reasons for making these changes in design are described below.

Design changes to meet NOAA Fisheries' Fish Passage Design Criteria

Action item 3 above is a proposed change developed to improve fish handling and to help achieve Klickitat subbasin monitoring and evaluation. New salmonid fish passage facility design criteria (Anadromous Salmonid Passage Facility Design, NOAA Fisheries, February 2008) were issued by NOAA Fisheries during the course of Lyle Falls FEIS development. Discussions have been ongoing with NOAA Fisheries staff to determine whether the Lyle Falls design meet the new criteria. The fish handling facility design changes, including the capture bay and water control vault reorientation, fish lift, and fish lift reservoir provide improved "water to water" transfer of ESA listed steelhead and bull trout, minimizing the extent to which fish are handled out of the water. Fish handling improvements to meet NOAA Fisheries criteria promote greater operational efficiency in conducting the monitoring and evaluation (M&E) activities. The proposed fish lift system would allow biologists to more effectively handle and manage fish sampling.

This new system would allow for radio telemetry studies and for more accurate and statistically sound fish sampling, in contrast to the scalloped brail system analyzed in the EIS.

Design Changes as a Result of PUD Requirements

Action items 4 and 5 are required to meet PUD design criteria for electrical service to the project site. On-site visits with the PUD took place after the FEIS and ROD were released. Designs were further refined following the site visit and locations of underground vaults and manholes to access buried utilities were identified.

Design Changes as a Result of Tribal Negotiation

Action item 2 resulted from discussions with tribal members who fish at the traditional fishing site below Lyle Falls.

Other Design Changes

Other site plan modifications serve to implement the mitigation action plan prepared pursuant to the ROD for the Lyle Falls passage project. Some modifications reflect the natural progression of design development to provide the basis for construction documents and other site accommodations that promote project constructability. These include action items 1, 6, 7, 8, and 9.

Revisions that were proposed but then deleted

The YN proposed to modify the rock disposal area to create a landscape berm. Following the project site visit on May 28, 2009, the U.S. Forest Service (USFS) recommended that the proposed landscape berm be deleted from the project (see aesthetic section on page 8). Therefore, the landscape berm has been removed from the project design and is no longer part of the project.

The YN proposed to add a new propane tank enclosure and piping. After further consideration and discussion with the PUD, the new propane tank and enclosure were determined not to be required and have also been removed from the project design.

Coordination with Cooperating Agencies

The USFS, Washington Department of Fish and Wildlife (WDFW), and YN were cooperating agencies with BPA in the preparation of the EIS for the project. The USFS administers portions of the Klickitat River under the National Wild and Scenic Rivers Act. The WDFW owns the majority of the existing Lyle Falls fishway and has used the EIS as a basis for issuing its Hydraulic Project Approval.

BPA sent courtesy notifications to the USFS and WDFW on May 11, 2009 to inform them of the proposed revisions to the project and to determine if any further administrative or procedural actions were needed from their organizations.

USFS

The USFS Regional Forester provided a letter, dated June 5, 2009, concluding that the proposed project changes are within the effects evaluated under their original Wild and Scenic River consistency determination of November 5, 2008 and that no modifications or updates to it are warranted. The proposed changes “will not have a direct or adverse effect on the values for which the Klickitat River was designated as a Wild and Scenic River.”

An additional USFS letter, dated June 3, 2009, from the Area Manager of the Columbia River Scenic Gorge National Scenic Area outlined several mitigation actions and conclusions that resulted from an on-site visit discussing the proposed changes on May 28, 2009. These mitigation actions stated that excavated rock could be used as a base layer in the new fisherman’s parking area but all other excavated

rock would have to be removed from the site. The letter also described guidelines for building colors, replanting of vegetation, prevention of invasive species, and requested galvanized steel be used for the metal grating over the fish passage transportation facility. These are all included in the revised mitigation action plan.

WDFW

BPA received a copy of the May 12, 2009 Hydraulic Project Approval that was prepared by WDFW for the project. This authorization allows construction of the Lyle Falls Fish Passage Project with provisions. These provisions will be included in the overall mitigation action plan.

National Marine Fisheries Service

The Mitigation Action Plan included with the ROD required the project to meet the current design standards of the NOAA Fisheries Anadromous Salmonid Passage Facility Design Guidelines. The most current design plans represent ongoing coordination meetings that have occurred between the YN's engineer and NOAA Fisheries. In particular, these discussions have resulted in the following:

- Modifications to reduce the fishway channel cell-to-cell energy dissipation factors,
- Additional juvenile fish-friendly features to reduce the slot velocity and screen dampening to minimize "hot spot" effects,
- Modifications to the existing fishway elements to accommodate better lamprey passage, and
- Addition of a Pacific lamprey fish passage design at the fish ladder entrance to allow for their improved passage.

The new lamprey access ladder was coordinated with Dr. Mary Mosier and Mr. Jim Simonson of NOAA Fisheries. The eelway includes monitoring and evaluation capability and the potential for PIT-tag interrogation. NOAA Fisheries provided written documentation on June 8, 2009, on the consistency of the revised facility designs with the Anadromous Salmonid Passage Facility Guidelines. The YN does not expect any substantial design modifications after this confirmation.

Environmental Effects:

Acreeage of Disturbance

There are two main differences between the revised project area boundary and the project footprint analyzed in the FEIS. A parking area for fishermen and a 90-foot-long access trail to provide access from the parking area to the traditional tribal fishing on the Klickitat River were added. These project features, totaling 0.22 acres, are located at the southernmost boundary of the project and will provide needed tribal parking and access for fishermen during project construction and beyond. The trail will likely improve human safety while supporting this long-standing cultural practice. In addition, changes to the design of the facility itself, including the transportation channel relocation, fish lift reservoir, new vault and manhold structures, and the new equipment building, have caused shifts in acreages.

A comparison of acreage of disturbance between the project site plan evaluated in the FEIS and the revised site plan is outlined in Table 1. An explanation of the terms used in the table is provided below.

Impervious areas - Areas where man-made surfaces will prevent surface water from recharging to the earth (includes outhouse, equipment control building, new vaults and manholes, new fishway structure, temporary fish handling trailer, temporary cofferdam, new fish lift reservoir, and existing fishway that was constructed in 1953).

Pervious area - Area where altered man-made surfaces will allow water to recharge into the earth (includes new buried utilities, additional roadway, fishermen's parking area, and new rock walkway from the parking area to the river).

Revegetation – Areas temporarily disturbed by construction where native grasses, shrubs, and trees will be planted to restore landscape visual features, stabilize soil surface conditions, and provide visual screens.

Table 1. Acreage comparison between the original and revised site plans.

	Acreage of project site identified in the FEIS	Acreage of the revised project site plan
Total project area footprint	3.6 acres	3.59 acres
Overall project area disturbed by construction	1.36 acres	1.52 acres
Fishermen’s parking area	n/a	0.22 acres*
Total area to be revegetated	0.85 acres	0.71 acres
New developed pervious area	0.21 acres	0.46 acres
New developed impervious area	0.16 acres	0.21 acres
Existing impervious area (existing fishway)	0.14 acres	0.14 acres

***Included in the new developed pervious area acreage**

Effects of the Proposed Changes

The following resources were examined to determine whether the proposed changes to the site plan would result in impacts that are outside the range of those discussed in the FEIS. No potential impact differences are expected to occur to water resources, air quality, noise, land use, transportation, recreation, or socioeconomics, so these impacts were not included in the analysis.

Geology and Soils

As shown in Table 1 above, construction would impact an additional 0.16 acres, for a new total of 1.52 acres of disturbance. The physical disturbances to geology and soils include the additional road and parking expansion, additional fishermen’s parking area and rock walkway, new fish lift reservoir, new alignment of overhead electrical service, relocation of one existing power pole, revised equipment control building location, new vault and manhole structures, burial of new utilities, relocation of the transportation channel (fishway), and relocation of the transportation channel access road. The FEIS addressed the equipment control building, trenching about 225 feet for underground utilities, the transportation channel, and the transportation channel access road. The revised disturbances would largely be on upland landscapes within the same soil types as identified in the FEIS, so no new effects are anticipated.

Fisheries, Vegetation and Wildlife

The movement of the new fish transportation channel about 15 feet further upland from the original project design location would, in part, further minimize the interface between the project and fish habitat in the Klickitat River. The remaining project revisions would result in no additional changes to fish habitat compared to the FEIS.

Many of the proposed changes will decrease the impacts to fish by greatly reducing the need for handling fish during the sorting and trap operation and by improving fish passage through the fishway.

Impacts to vegetation and wildlife are expected to be minimal. Care was taken during the final project design to avoid removing as many mature native trees as possible. Therefore, the number of trees to be removed will be roughly equal to the original plan. The revised project design would not cause substantially different effects to fish, vegetation, or wildlife compared to the FEIS.

Threatened and Endangered Species

The ESA-listed species evaluated for potential impacts in the FEIS were mid-Columbia River steelhead and bull trout. As discussed above in the Fisheries, Vegetation, and Wildlife section, the proposed changes would result in fewer effects to steelhead and bull trout than the original plan, so no additional consultation is required.

Wetlands and Floodplains

The new site plan would still avoid impacts to the existing wetland on the project site. Impacts to the floodplain would be slightly less due to the change from a permanent fish handling facility in the floodplain to a moveable trailer that can be stored out of the floodplain during normal high flow periods.

Cultural Resources

The one area in the revised site plan that is located outside the original project footprint is the fisherman's parking area. As mentioned earlier, this area is 0.22 acre in size and is located at the southernmost edge of the project boundary. YN archaeologists conducted a pedestrian survey of the proposed parking area on May 12, 2009. No artifacts were encountered during the survey although pre-contact artifacts were identified in an area adjacent to, but outside the project area. The May 20, 2009 report recommended that the project proceed with an YN cultural resources monitoring crew present during project construction should any unforeseen cultural materials be encountered. This particular mitigation measure was also identified in the FEIS and in the Mitigation Action Plan included in the Record of Decision.

In compliance with Section 106 of the National Historic Preservation Act, BPA reinitiated consultation by forwarding the report to the State Historic Preservation Office (SHPO) and affected tribes. The SHPO and the YN Tribal Historic Preservation Office have both concurred with our findings and determination of no historic properties adversely affected.

Human Health and Public Safety

Separation of the fishermen parking from the construction area and the new trail to the fishing area would improve the safety of the fishermen. The addition of the new toilet would improve human health.

Aesthetics

A field site visit was conducted on May 28, 2009. The USFS, YN, Harbor Engineers, and BPA evaluated proposed changes and their effects on the visual character of the area.

A landscape berm had been proposed by the project engineers as a way to visually screen the new facilities from the Klickitat Trail and dispose of excess rock resulting from the blasting and excavation of the new fishway transportation channel. Each piece of the estimated rock debris would likely be smaller in size than a basketball, with all the pieces estimated to be about 4,000 cubic yards in volume. The original plan was to place this rock material near the Klickitat Trail in a berm ranging up to about 12 feet high covering a quarter-acre area. This created berm would be dressed with topsoil then replanted with native vegetation to simulate the visual components of the surrounding environment.

The USFS recommend against this berm alternative because it could have caused a substantial visual impact, possibly affecting the visual quality of the Wild and Scenic River values and the Klickitat Trail. The YN agreed to haul the rock material away from the project site during construction. Hauling away the rock was estimated to cost about the same as creating the landscape berm. The landscape berm was dropped from further consideration.

The USFS made additional recommendations from the May 28, 2009 site visit regarding the planting of native trees and shrubs to ensure that visual screening is adequately provided. They were also concerned about the potential aesthetics and visual impact of permanent buildings, roofing coloration, buildings coloration, and associated features. Their recommendations, which have been incorporated into the Mitigation Action Plan, are outlined below:

- The excavated rock from the fish channel can be used to fill the bottom layer of the new fishermen's parking area and the remaining rock should be hauled offsite.
- The proposed landscape berm was found to be out of character with the setting and was removed from the project site design.
- Native trees will be planted at Key Observation Point 1 to help obscure the view of the larger buildings.
- The fish lift tower will have an uncolored, concrete footing; the lower portion will have a facing of lighter colored, split-face concrete masonry unit (CMU) transitioning to a darker CMU higher up; and the roof and metal stairs will be a dark green color. The water reservoir will have the same darker CMU as the upper section of the fish lift tower; the roof will be a dark green.
- The maintenance building will have the same darker CMU as the upper section of the fish lift tower; the roof will be a dark green color.
- The outhouse will have the same darker CMU as the upper section of the fish lift tower; vegetation may be planted on the trail side of the building if necessary.
- The taller buildings will include horizontal design elements of subtle color and/or texture variations of CMU material to help break up their vertical lines; all buildings may use YN designs.
- Trees destroyed during construction will be replanted as outlined in the FEIS.
- Invasive species will be monitored and invasive plant species will be prevented from establishing on the site.
- Galvanized steel will be used for the metal grating over the fishway where appropriate.

Mitigation Implementation

BPA's ROD included a Mitigation Action Plan with a number of mitigation measures to be implemented. The original mitigation measures identified in the FEIS and Mitigation Action Plan will apply, with the addition of the visual mitigation outlined above under Aesthetics and mitigation specified in the Hydraulic Permit Approval from WDFW. The revised Mitigation Action Plan is attached.

The following are updates on several of those measures which needed to be addressed before construction. The YN will produce reports and summaries to periodically identify how mitigation measures are being/have been addressed during the pre-project and construction phases.

Western Tree Squirrel

One measure from the Mitigation Action Plan was to survey for the western tree squirrel. This is a federal species of concern and state-listed threatened mammal. A western tree squirrel survey was conducted in the project area by Mark Nuetzmann, YN Biologist, on April 30, 2009, and the following was recorded:

- Very sparse numbers of trees were observed,
- The area does not represent western gray squirrel habitat,
- The tree make-up was about 90 percent Oregon oak and 10 percent ponderosa pine,
- No western tree squirrels or nests were observed, and
- The pine density of the project area is much less than that of desired habitat.

No further western tree squirrel surveys or mitigation were deemed necessary for this project.

Osprey Nesting

The YN has collaborated with the WDFW (Area Biologist David Anderson) and the PUD to determine the appropriate action to address the existing osprey nesting that has traditionally occurred near the project site. The particular concern raised in the Draft EIS comment period was the effects of construction noise on juvenile osprey in the nest during the summer construction season(s). The resultant preferred action is to “leave the existing platform in place and hope that if the birds nest there, the young are old enough that when the blasting does occur, the adults will not abandon the site and adapt to the disturbance.” The YN will notify WDFW prior to blasting to ensure monitors are on site during this activity.

Rare Plant Survey

A Phase I rare plant survey was conducted in late May and early June, 2009 by YN botanists. A report was issued to Bill Sharp of the YN on June 22, 2009. No federally-listed species were found, but one state threatened and potentially one state sensitive species were found. The YN is consulting with the Washington State botanist on appropriate mitigation for these rare plants. The YN will implement the agreed upon mitigation.

The report also noted the presence of noxious weeds and recommended that they be addressed after construction through a combination of treatment and revegetation to reduce and control their spread. The YN will collaborate with WDFW regarding the application of appropriate herbicides to control invasive weeds on the property.

Permitting/Authorizations

- The project has been approved by WDFW as necessary for improvement of fish passage per their March 19, 2009 letter. WDFW adopted the BPA FEIS as fulfillment of state SEPA requirements on April 1, 2009.
- The project has received the Hydraulic Project Approval (HPA) from WDFW dated May 12, 2009 that contains 29 conditions to be followed.
- The U.S. Army Corps of Engineers issued a Clean Water Act Section 404 permit for the project on July 22, 2009.
- The Klickitat County Planning Department determined that the project is exempt from the Shoreline Management Act substantial development permit requirement as documented in a memo dated June 2, 2009.

Summary

- The revised project design changes to the Lyle Falls Fish Passage include only changes that are localized and site-specific, with minimal construction extending beyond the original project perimeter.
- The nature and context of the kinds of environmental impacts from the revised project are generally consistent with the analysis identified in the Lyle Falls Fish Passage Project Draft and Final Environmental Impact Statements, Record of Decision, and with BPA's Fish and Wildlife Implementation Plan EIS.
- The revised plan will not affect the preferred action identified in the final Lyle Falls Fish Passage EIS, and no changes to it are necessary.
- No changes are necessary to the Lyle Falls Fish Passage Project ROD.
- The overall changes in acreage with the revised project are small and insignificant and do not raise new issues or circumstances.
- BPA determined that there would be no further effects on cultural resources, and no further cultural testing is recommended; the Washington SHPO concurred with our determination of no historic properties adversely affected via letter dated July 7, 2009.
- The YN will provide reports to BPA that address status and completion of each mitigation measure identified in the Mitigation Act Plan as conditions to construction.
- There are no other anticipated project permitting needs or other approvals needed for construction and operation of the project.