



## **DRAFT FINDING OF NO SIGNIFICANT IMPACT**

### **Draft Integrated Letter Report and Programmatic Environmental Assessment Federal Participation in Northern Pike Suppression in Washington and Idaho through the Aquatic Plant Control Program**

#### **Washington and Idaho**

The U.S. Army Corps of Engineers, Walla Walla District (USACE) has conducted an environmental analysis in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended. Pursuant to NEPA, USACE drafted an Integrated Letter Report and Programmatic Environmental Assessment (LR/PEA) that analyzes the potential environmental impacts associated with USACE's proposed participation in cost-share agreements with various non-Federal entities (NFEs) to suppress populations of northern pike (*Esox lucius*), an aquatic invasive species, within the Upper Columbia River Basin (UCRB). USACE is authorized by Section 104 of the River and Harbor Act (RHA) of 1958 (33 United States Code [U.S.C.] § 610), as amended, to develop a program to protect the Columbia River Basin from invasive northern pike. The Federal cost-share portion would be up to 50 percent of the costs required for prevention, detection, eradication, and suppression of this species.

The proposed action is needed as the presence of this aquatic invasive species has proven to threaten native fish populations, including endangered salmon and steelhead. Despite ongoing conservation efforts, financial constraints limit the capacity of local agencies and tribes, requiring Federal support to effectively address the issue. The proposed action is intended to enhance and expand ongoing northern pike management efforts in the UCRB by leveraging Federal and local resources. This collaborative approach aims to restore ecological balance, preserve native fish species, and support the region's biodiversity, cultural, and economic values.

The draft LR/PEA, incorporated herein by reference, considered two alternatives: Alternative 1 (No Action) and Alternative 2 (Comprehensive Adaptive Improvements – Cost-Shared Northern Pike Suppression).

#### **Alternative 1: No Action**

Alternative 1 represents a continuation of the NFEs' current practices (see Section 2.1.3 of LR/PEA), in which USACE would not cost share with the NFEs to suppress and prevent the spread of northern pike in the study area.

#### **Alternative 2: Comprehensive Adaptive Improvements – Cost-Shared Northern Pike Suppression**

Alternative 2 consists of all measures identified in Section 3.4 of the LR/PEA that met the Federal and study objectives without violating any planning constraints. This alternative assumes USACE would use Federal funding to cost share at fifty percent with the NFEs



to support and expand existing northern pike suppression and control programs in the study area. The measures in Alternative 2 are as follows:

**Monitoring - Telemetry:** Telemetry is a technology used to remotely monitor and track the movements and behaviors of animals, including fish, using electronic tags. This method provides detailed data on northern pike movement, habitat use, and migration patterns.

**Monitoring - Environmental DNA (eDNA):** eDNA is a sampling techniques used to detect the presence of northern pike in water bodies more efficiently. This method can provide early detection of northern pike in new areas, aiding in prompt and targeted control efforts.

**Suppression - Electrofishing:** Electrofishing is a fish capture technique that uses electrical currents to temporarily immobilize fish, making them easy to net. For invasive northern pike, electrofishing helps reduce populations while minimizing impacts on non-target species and habitats.

**Suppression - Hook and Line:** Removal of northern pike by hook and line angling.

**Suppression - Netting:** Removal of northern pike with large nets such as gillnetting, beach seining, trammel netting, and fyke netting.

**Eradication - Chemical:** This measure employs targeted chemical treatments to selectively manage northern pike populations in isolated waters.

**Surveying - Surveys during Drawdowns of Lake Levels:** Drawdowns are typically done to lower reservoir levels for flood risk reduction. Drawdown surveys, which are done by observation, are conducted opportunistically in areas dewatered by reservoir drawdowns.

**Outreach - Holistic Ecosystem Management Partnership:** Combine indigenous ecological insights with global expertise by fostering collaborations among local communities, academia, and research institutions to develop comprehensive suppression solutions.

**Outreach - Community-Based Monitoring Initiative:** This initiative promotes active engagement in environmental stewardship through the expansion of citizen science and community-led programs, training participants to contribute to northern pike monitoring and data collection efforts.

**Outreach - Public Education:** Educate the public on the adverse effects northern pike pose to local watersheds and economies and inform on management actions. Enhance and expand online platforms and mobile apps that engage the public in reporting northern pike sightings and catches. Install and maintain signage, purchase advertisements, and conduct outreach and education campaigns.

**Reward Program - Incentivized Angler Engagement Program:** Public fishing competitions and reward-based initiatives to motivate and involve anglers in northern pike removal efforts. For the cost-share program, only activities that are related to setting up or organizing these reward programs or events are eligible. Due to USACE regulations, prizes or cash bounties cannot be cost shared.

Under the future program, each of the measures identified above would be eligible for cost share with the NFEs. Not all measures are required to be utilized by the NFEs— instead, the best combination of measures would be determined annually by the NFEs.



Best management measures for each NFE would be determined by their technical staff, based on the needs of their program, as well as the ability to fund their portions of the program and the availability of Federal funding. Over time, the locations of activities, and the nature and timing of their operations, may change and adapt as the NFEs continue to refine and optimize their program’s overall effectiveness.

For the two alternatives, the potential environmental impacts to various resources were evaluated, as appropriate. A summary assessment of the potential effects of the Recommended Alternative are listed in Table 1.

**Table 1. Summary of Impacts of the Recommended Alternative.**

Resource	Less than significant effects	Insignificant effects as a result of mitigation	Resource unaffected by action
Fisheries and Aquatic Resources	X	-	-
Water Quality	X	-	-
Wildlife and Terrestrial Resources	X	-	-
Aesthetics and Visual Resources	X	-	-
Recreation	X	-	-
Cultural and Historic Resources	X	-	-

The analysis conducted within the LR/PEA determined the Recommended Alternative would result in less than significant effects to all resources considered, to include cumulative impacts.

### **Endangered Species Act**

The Endangered Species Act (ESA) established a national program for the conservation of threatened and endangered fish, wildlife, and plants and the habitat upon which they depend. Section 7(a)(2) of the ESA requires Federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS), as appropriate, to ensure their actions are not likely to jeopardize the continued existence of endangered or threatened species or adversely modify or destroy their critical habitats. Section 7(c) of the ESA and the Federal regulations on endangered species coordination (50 Code of Federal Regulations [CFR] § 402.12) require that Federal agencies prepare biological assessments of the potential effects of major actions on listed species and critical habitat.

Programmatic Biological Assessments (PBAs) were submitted to USFWS and NMFS on January 2, 2025. The PBAs were prepared pursuant to Section 7(a)(2) of the ESA to evaluate the effects of USACE’s proposed Northern Pike Control Cost-Share Program in Washington and Idaho on listed species under the jurisdiction of USFWS and NMFS.

USACE determined the Recommended Alternative “may affect and is likely to adversely affect” four ESA-listed species (bull trout, Kootenai River white sturgeon, Upper



Columbia River Spring-run Chinook, and Upper Columbia River steelhead) under the jurisdiction of USFWS and NMFS. USACE further concludes the Recommended Alternative “may affect, but is not likely to adversely affect” applicable critical habitat for these species. USACE determined the Recommended Alternative would have “no effect” on the remaining 11 listed species (all terrestrial mammals, plants, and birds) as they would be spatially separated from the effect of the proposed actions. USACE expects biological opinions with incidental take statements in the spring of 2025.

### **Clean Water Act**

The Federal Water Pollution Control Act (33 U.S.C. § 1251 et seq., as amended) is more commonly referred to as the Clean Water Act (CWA). This act is the primary legislative vehicle for Federal water pollution control programs and the basic structure for regulating discharges of pollutants into waters of the United States (WOTUS). The act was established to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” The CWA sets goals to eliminate discharges of pollutants into navigable water, protect fish and wildlife, and prohibit the discharge of toxic pollutants in quantities that could adversely affect the environment.

Section 402 of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) program, pertains to discharge of pollutants. Section 404 of the CWA established a program to regulate the discharge of dredged or fill material into WOTUS, and Section 401 requires that any Federal activity that may result in a discharge to WOTUS must first receive a water quality certification from the state in which the activity would occur.

The proposed activities detailed in this report are not expected to require authorization under Sections 402, 404, or 401, except for the application of Rotenone to eradicate newly discovered populations of northern pike in isolated waters. Non-Federal entities participating in the cost-share program that apply pesticides in WOTUS would be required to obtain the necessary NPDES permits under Section 402 of the CWA. These permits ensure that pesticide applications comply with Federal water quality standards and protect aquatic ecosystems from potential harm. There are no activities anticipated that would necessitate discharge of fill into WOTUS. Implementation of the Recommended Alternative would be in compliance with this Act.

### **National Historic Preservation Act**

The National Historic Preservation Act (NHPA) of 1966, as amended, directs Federal agencies to assume responsibility for all cultural resources under their jurisdiction. Section 106 of NHPA requires agencies to consider the potential effects of their actions on properties that are listed, or are eligible for listing, on the National Register of Historic Places. The NHPA implementing regulations, 36 CFR Part 800, requires that the Federal agency consult with the State Historic Preservation Officer, Tribes, and interested parties to ensure that all historic properties are adequately identified, evaluated, and considered in planning for proposed undertakings.



All proposed actions, particularly any requiring ground-disturbing activity in previously undisturbed areas must first meet compliance requirements of the NHPA, as amended, and associated Section 106 review. Implementation of the Recommended Alternative would be in compliance with this Act.

### **Rivers and Harbors Act**

The RHA refers to a conglomeration of many pieces of legislation and appropriations passed by Congress since the first such legislation in 1824. The RHA of 1899 was the first Federal water pollution act in the United States. It focuses on protecting navigation, protecting waters from pollution, and acted as a precursor to the CWA. Section 10 of the RHA of 1899 regulates alteration of and prohibits unauthorized obstruction of navigable WOTUS.

The proposed action is limited to northern pike control and outreach and would not involve the construction of any structure in or over any navigable water (Section 9 Compliance), or work affecting the course, location, condition, or physical capacity of such waters (Section 10 Compliance). Implementation of the Recommended Alternative would be in compliance with this Act.

In compliance with NEPA, the draft LR/PEA and Finding of No Significant Impact (FONSI), along with all supporting appendices, will be made available for a 30-day public review and comment period beginning on or around March 28, 2025, and concluding on April 27, 2025.

All applicable laws, regulations, and Executive Orders will be considered in evaluating alternatives and potential environmental effects. Based on the LR/PEA, reviews by other Federal, state, and local agencies, Tribes, public input, and internal review, USACE's preliminary determination is that participation in cost-share agreements with NFEs for northern pike suppression would not significantly affect the quality of the human environment. Therefore, unless substantive comments identifying significant impacts are received, preparation of an Environmental Impact Statement will not be required. USACE may proceed with finalizing the LR/PEA and FONSI following the public comment period, after which cost-share agreements with NFEs may be executed to implement the proposed suppression activities.

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