

Appendix A – Implementation Plan

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1 Introduction

The Trinity River Restoration Program (TRRP) of the Bureau of Reclamation (Reclamation) has developed the Trinity River Watershed Restoration Project (Project) in cooperation with the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS). The Proposed Action alternative is described thoroughly in Section 4 of the Project's Environmental Assessment (EA) and consists of a suite of instream and riparian restoration activities. Proposed activities are grouped into three general categories: instream habitat restoration; upslope habitat restoration; and road maintenance, rehabilitation, and decommissioning activities. In total, there are 11 restoration activity categories included in the Project as shown below. User-friendly activity cards summarizing each activity category are included in Appendix H of the PEA.

Instream Habitat Restoration:

1. Restoration and Enhancement of In-Channel Habitat
2. Floodplain Restoration
3. Removal or Retrofitting of Fish Passage Barriers, Small Dams, Flood Gates, Pilings and Other In-water Structures
4. Water Conservation Projects
5. Salmon Carcass Placement
6. Remote Site Incubators

Upslope Habitat Restoration:

7. Bioengineered Bank Stabilization
8. Aquatic, Wetland, Riparian, and Upslope Habitat Enhancement

Road Maintenance, Rehabilitation, and Decommissioning Activities:

9. Road Maintenance
10. Road Rehabilitation
11. Road Decommissioning

This implementation plan is intended to be a tool for site-specific project proponents to use for watershed restoration projects within the Trinity River watershed (within the Project activity area). This document provides guidance about the environmental compliance process, sideboards site-specific restoration projects must adhere to and other helpful information.

1.1 Purpose and Need

TRRP was established to restore the fisheries of the Trinity River, which had precipitously declined. To that end, the purpose of the Project is to improve instream and riparian habitat to accelerate the recovery of north coast salmonid populations (coho salmon, steelhead, and Chinook salmon) and other special status aquatic species.

1.2 Project Activity Area

The proposed Project activities would take place within the Trinity River watershed along the mainstem and tributaries both below and above the Lewiston and Trinity dams as shown in Figure 1-1 of the EA. Trinity River watershed areas located within the Six Rivers National Forest and the Hoopa Valley Reservation are excluded from the Project activity area.

1.3 Activities not Included in the EA

The following site-specific project activity types are not covered by the EA:

- Road-related activities that are not primarily for the purpose of watershed restoration (e.g., instream sediment reduction, restoring floodplain processes, etc.)
- Non-native invasive plant species control via herbicide application
- Fuels reduction projects including understory burning
- Silvicultural activities (e.g., timber harvest/management)
- Grazing management activities with the exception of: prescribed grazing for non-native invasive plant control; and installation of livestock exclusion fencing intended to prevent impacts to stream channels and/or floodplains

2 Site-Specific Project Implementation

Each site-specific restoration project undertaken by a project proponent would be required to go through its own review process (led by TRRP, BLM, or USFS) to ensure these site-specific projects: meet the purpose of the Project; the proposed activities align with the Proposed Action; are implemented according to the Project environmental commitments; comply with the applicable environmental regulations; and do not exceed the effects determined in the EA (Figure 2-1). If a site specific project's effects are beyond those determined in the EA, further NEPA analysis and documentation would be required (e.g., Supplemental EA, Supplemental Analysis).

Generally, site-specific projects that are funded federally (e.g., TRRP, USFS, or BLM), are on federal land (e.g., USFS- or BLM-managed land), or require federal approval (e.g., a U.S. Army Corps of Engineers 404 permit) have what is called a "federal nexus" and therefore, must comply with federal regulatory requirements including, but not limited to, those of the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), National Historic Preservation Act (NHPA), Wild and Scenic Rivers Act (WSRA), and Wilderness Act. The process for complying with NEPA, ESA, NHPA, WSRA, and the Wilderness Act related to the Project are outlined in detail below. See Appendix D of the Project EA for further details on these and additional laws and regulations. Some site-specific projects may involve multiple federal agencies. To comply with these federal regulations, a lead federal agency may be determined for NEPA and/or NHPA compliance through coordination between these agencies. For example, the Section 106 NHPA review process can be led by one federal agency for a site-specific project that involves more than one federal agency.

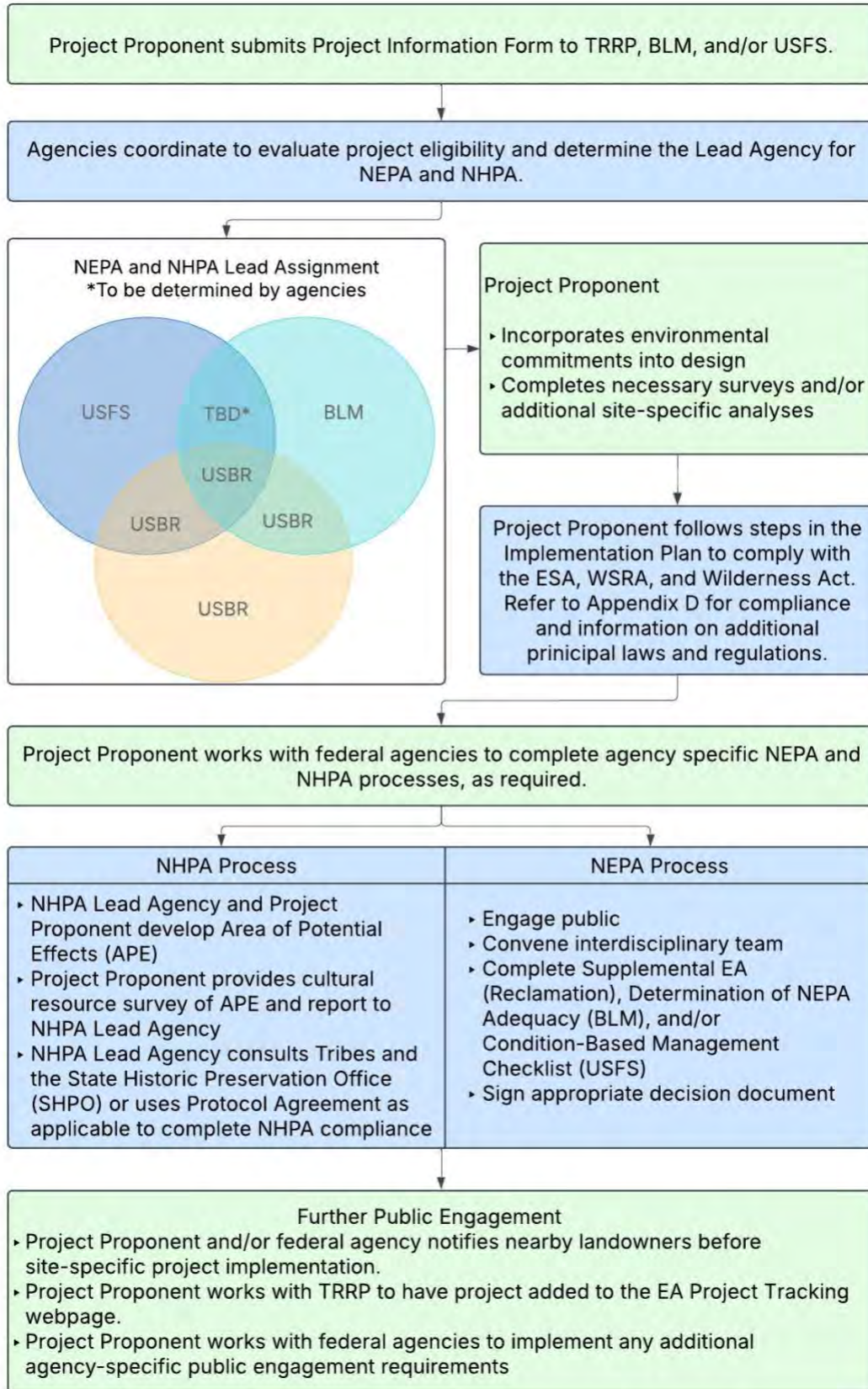


Figure 2-1. Implementation Flowchart

2.1 National Environmental Policy Act

Each site-specific project proponent will need to coordinate with the federal agencies to determine which agency will facilitate the NEPA process. A Venn Diagram developed to assist with this determination is included in Figure 2-1. Generally, site-specific projects involving TRRP/Reclamation will require a Supplemental EA; site-specific projects with BLM as the only federal agency will require a Determination of NEPA Adequacy (DNA); and site-specific projects with the USFS as the only federal agency will require a Condition-Based Management (CBM) checklist.

2.1.1 TRRP (Reclamation)

For each site-specific restoration project completed under the Project EA with TRRP or Reclamation as the lead federal agency the following steps need to be taken:

1. Submit the Project Information Form (link provided in Section 3) to TRRP staff for review.
2. The project proponent would work with TRRP staff to prepare a Supplemental EA, which would consist of a brief site-specific environmental effects analysis. Additional site-specific environmental effects analyses may be required if effects are beyond those disclosed in the Project EA. A link to the Supplemental EA template can be found in Section 3.
3. Based on the Supplemental EA, a Finding of No Significant Impact (FONSI) may be prepared if the Supplemental EA has demonstrated that there are no significant impacts resulting from the site-specific project; if not, an Environmental Impact Statement (EIS) will be initiated.
4. If the BLM or USFS are a cooperating agency on a Supplemental EA, a NEPA Decision would be issued, and the project may be subject to a 30-day appeal and/or objection period.
5. The final Supplemental EA will be posted to the TRRP website and the Bureau of Reclamation NEPA website.

2.1.2 BLM

For each site-specific restoration project completed under the Project EA with BLM as the lead federal agency the following steps need to be taken:

1. The project proponent will submit the Project Information Form (link provided in Section 3) to the BLM Interdisciplinary Team for review.
2. BLM staff and/or the project proponent will complete a DNA to ensure the associated effects of each site-specific project will not exceed those described in the Project EA and ensure conformance with the BLM's Northwest California Integrated Resources Management Plan (NCIP).
3. If a DNA determines that the effects will exceed the effects disclosed in the Project EA, additional analysis under a separate NEPA document will be required.
4. The DNAs will describe the basic site-specific project location and either the proposed finding of effect to cultural resources or the proposed use of an exemption under the California BLM State Protocol Agreement (PA), if that is the case.
5. If the PA is utilized for determining site-specific project compliance with the NHPA, the BLM will post a draft DNA on the BLM's ePlanning NEPA register for at least seven days, consistent with the terms of the

PA. If multiple federal agencies are involved in a site-specific project, the PA cannot be used due to stipulations within the PA. In this case, the BLM or designated NHPA Lead will comply with 36 CFR 800. More information on NHPA compliance can be found in Section 2.3.

6. BLM staff will post the DNA on BLM's ePlanning website for public comment.
7. BLM will issue a Decision Record approving the site-specific restoration project, as analyzed in the DNA. Decision Records are subject to a 30-day appeal period for each site-specific project and subject to Administrative Remedies in accordance with regulations.

2.1.3 USFS

Site-specific restoration projects for which USFS is the lead federal agency would be implemented using a CBM approach to streamline restoration activities that enhance and restore salmonid habitat at the watershed-scale. The CBM approach can be applied where increased average temperatures and precipitation extremes, wildfire risk, and historic and ongoing anthropomorphic impacts create dynamic conditions that may change during the site-specific project implementation. As Project activities would be accomplished at the watershed-scale, the Project EA analyzed the effects of the activities using a conservative approach, analyzing all areas where Project activities would be feasible and appropriate. Project effects are summarized in Chapter 5 of the EA and additional details of the analyses are provided in the specialist reports in Appendices I, J, K, L, M of the EA. USFS Special Use Permittees may use the coverage of the Project EA through the CBM approach.

In general, USFS's CBM approach would entail the following sequence of implementation steps:

1. The project proponent will submit the Project Information Form (link provided in Section 3) to Shasta-Trinity National Forest (STNF) staff for review.
2. Interdisciplinary Review and Project Consistency
 - a. Environmental Assessment Consistency
 - i. Does the site-specific project meet the purpose of the Project?
 - ii. Do the site-specific proposed activities align with the Proposed Action?
 - iii. Will the site-specific project be implemented according to the Project environmental commitments?
 - iv. Does the site-specific project comply with the applicable environmental regulations?
 - v. Would the effects of implementation remain within what was analyzed and disclosed in the environmental assessment?
 - vi. Have conditions changed or has new information become available that would alter outcomes? If it is determined during review that effects of treatments would likely be outside what is analyzed in the environmental assessment, those adjustments would be modified to be within predicted effects, eliminated, or further appropriate NEPA process and decision for those adjustments would occur per Forest Service Handbook 1909.15.10, section 18.
 - b. Complete CBM Checklist
 - i. STNF resource specialists complete CBM Checklist (link provided in Section 3). The checklist brings together the results of the above steps in the review process and documents the results of interdisciplinary development and review of the site-specific project to be implemented.

3. Notifications and Consultation Verification
 - a. Notification to public (interested parties, neighbors, permittees, permit-holders, etc.)
 - b. Notification to permittees (range, utilities, etc.)
 - c. Consultation requirements: Verify the following questions –
 - i. Is consultation under Section 106 of the National Historic Preservation Act complete with Tribes, SHPO and other stakeholders?
 - ii. Is USFWS and NMFS consultation for relevant terrestrial, aquatic, and botanical species complete?
 - iii. Have consultation results been shared with unit-level biologists and line officers?
 - d. Are there any Regional Water Quality Control Board clearances required? See Appendix D of the EA for more information on the Clean Water Act.
 - e. Special area considerations: if any special areas where action requires approval from line officer authority above the level of the Forest (e.g., Regional Forest, Deputy Chief) are involved, has that permission been obtained to proceed? For example, vegetation manipulation in designated wilderness areas would need to have a minimum requirements analysis completed and approved prior to implementation.
4. For work to be completed on National Forest System Lands, USFS will need to have an agreement or contract in place with the proponent. Agreement types may include, but are not limited to, a non-funded agreement (non-FSM 1580), partnership agreement, interagency agreement, tribal agreement, or a special uses agreement.

Using this approach satisfies NEPA because there is validation of data and assumptions relied upon in the NEPA analysis prior to implementation. USFS would follow the direction in their agency’s NEPA guidance regarding evaluation of updated information, circumstances, and requirements that could trigger supplementation to the effects analysis included in the EA.

2.2 Endangered Species Act

ESA compliance for aquatic and terrestrial species is required for implementing site-specific watershed restoration projects. There may be multiple existing consultations for the U.S. Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service (NMFS, collectively called “the Services”) that site-specific projects may rely on for ESA compliance. Project proponents may also request individual site-specific project consultations with the Services as necessary. ESA coverage for the Project’s site-specific restoration activities may also be provided by the following biological opinions (BiOps):

- NMFS’ 2020 BiOp for the Trinity River Restoration Program’s Mechanical Channel Rehabilitation, Sediment Management, Watershed Restoration, and Monitoring Actions in Trinity County, California (2020 TRRP BiOp, WCRO-2019-03827); and
- USFWS’ 2025 Programmatic BiOp for the California Statewide Programmatic Restoration Effort (USFWS Statewide Restoration BiOp, FWS Reference: 2022-0005149-S7).

The fish and wildlife species as well as any associated designated critical habitat covered by these BiOps are discussed in detail in the Fisheries Technical Report (Appendix K of the EA) and the Wildlife Technical Report (Appendix L of the EA). ESA-listed plants are discussed in Appendix J of the EA.

The 2020 TRRP BiOp and the 2025 USFWS Statewide Restoration BiOp were used to develop the environmental commitments included in Appendix B of the EA to avoid and minimize Project effects to threatened and endangered species in compliance with ESA requirements. Both of these ESA Section 7 consultations may be subject to reinitiation due to species status updates and proposed action updates. At the time of the development of the EA, the 2020 TRRP BiOp is anticipated to be reinitiated to better align with the restoration activity categories that are part of the Proposed Action and to reduce project limitations. The USFWS Statewide Restoration BiOp had just been re-issued in February 2025 to include additional species such as northwestern pond turtle. Ultimately, guidance (including process and environmental commitments) included in the updated BiOps would supersede ESA compliance guidance included in the Project EA.

The ESA compliance process for each site-specific project according to these BiOps is described below.

2.2.1 2020 TRRP BiOp

The project proponent would send Project Notification Form information to the TRRP Natural Resources Specialist including the following:

1. Site-specific project name: use the same project name from notification to completion (i.e., Jones Creek 2015 Culvert Replacement)
2. Site-specific project location: watershed/stream name; and latitude and longitude (in decimal degrees); or map
3. Agency (project proponent) contact information: agency and project lead name
4. Timing: site-specific project start and end dates; and potential need to work outside of the in-water work window
5. Activity type
6. Project description: brief narrative of the site-specific project and objectives
7. Extent: stream length (feet/miles) and area (square feet/acres) to be treated (restored); and linear feet/miles of aquatic/riparian habitat benefited
8. Fish information
 - a. Species affected
 - b. Distance to occupied habitat
 - c. Fish handling required (seining/block nets/electrofishing/dewatering/etc.)
9. Verification that all appropriate Conservation Measures, Project Design Criteria, and BMPs listed in the TRRP BA (these have been incorporated into the environmental commitments included in Appendix B of the Project EA) have been thoroughly reviewed and will be incorporated into site-specific project design, implementation, and monitoring as appropriate based on project details. The interagency coordination team (lead federal agency and NMFS) may request additional verification dependent on the scope and scale of the site-specific project.
10. Effects determination of site-specific project for Southern Oregon Northern California Coast (SONCC) coho (no effect, NLAA, LAA)
11. Project lead fish biologist's signature (staff member of either the lead federal agency or the project proponent)

Following site-specific project completion, the project proponent will provide applicable monitoring and reporting information to the TRRP Natural Resources Specialist including, but not limited to, the following: any

capture and mortality of juvenile coho salmon; any problems that may have arisen during implementation of the activities; and any unforeseen ESA-listed fish effects as a result of site-specific project activities.

2.2.2 2025 USFWS Statewide Restoration BiOp¹

The Bureau of Reclamation California-Great Basin Region is an Action Agency on the USFWS Statewide Restoration BiOp (PBO). It is up to the Action Agencies (e.g. Reclamation, USFWS) to evaluate project eligibility. Project proponents will work with TRRP/Reclamation for coverage under the PBO.

- Step one: The project proponent contacts Action Agency (Reclamation).
- Step two: Action Agencies coordinate to evaluate project eligibility under the PBO.
- Step three: Obtain an Official Species List from the USFWS Information for Planning and Consultation (IPaC) online tool² to identify the listed or proposed species and evaluate their potential to occur in the Action Area
 - Determine General Protection Measures and Species Protection Measures (Appendix B of the Project EA) that are applicable based on project type, site-specific constraints, project location, and Covered Species potentially occurring in the Action Area.
 - In coordination with the Lead Action Agency, the project proponent can seek Technical Assistance with the appropriate USFWS Field Office to discuss project-specific needs and/or identify applicable protection measures.
 - Prepare and submit ESA Section 7(a)(2) Review Form (Appendix A of the PBO) to Lead Agency³
- Step four: Within 30 calendar days (and no longer than 60 calendar days) of receiving the ESA Section 7(a)(2) Review Form, the Lead Action Agency will review the ESA Section 7(a)(2) Review Form for completeness and notify the project proponent if their form is complete or incomplete.
 - If the ESA Section 7(a)(2) Review Form is complete, the Lead Action Agency will submit the form to their respective USFWS Field Office for Section 7(a)(2) compliance under the PBO.
 - If the ESA Section 7(a)(2) Review Form is incomplete, the Lead Action Agency will notify the project proponent where additional information is needed. Return to Step 3 above until the form is complete.
 - The project proponent may not implement their project until all applicable Federal, State, and local permits are obtained.
- Step five: Project proponent implements the project as described on the approved ESA Section 7(a)(2) Review Form. Report all injury or mortality of Covered Species to USFWS ES (Ecological Services Program) within 48 hours.
 - Submit a Post-Construction Report Form (Appendix B of the PBO) to USFWS ES (with the Action Agency copied) by December 1st. If there is ongoing revegetation or species monitoring beyond the report due date, provide a report annually on December 1st until success criteria have been met, or monitoring has ceased.

¹ From “Figure 2: Flow Chart on Administration for ESA Section 7(a)(2) Compliance with the USFWS” in the 2025 USFWS Statewide Restoration BiOp.

² <https://ipac.ecosphere.fws.gov/>

³ Ideally, the Project Proponent will submit the completed ESA Section 7(a) (2) Review Form and the Clean Water Act permit application concurrently. USFWS Programs have delegated Section 7(a)(2) authority and will serve the role of USFWS ES for their respective projects.

- All revegetated areas will be maintained and monitored for a minimum of 2 years after replanting is complete, or until success criteria are met, to ensure the revegetation effort is successful. The standard for success is 60% cover compared to an intact local reference site. If an appropriate reference site or pre-project conditions cannot be identified, success criteria will be developed for review and approval on a project-by-project basis, based on the specific habitat impacted and known recovery times for that habitat and geography.
- Step six: Action Agencies using the PBO will meet annually in January to discuss implementation, program-wide impacts and identify any needs to the program or process.

2.2.3 Limits on Proposed Activities Frequency and Location

Project types and quantities may be limited depending on which BiOp(s) a site-specific project is relying on. The most common BiOps anticipated to be used for site-specific projects completed under the Project EA are the 2020 TRRP BiOp and the 2025 USFWS Statewide Restoration BiOp. Current annual watershed restoration project limitations based on the 2020 TRRP BiOp are listed below.

- 2 fish passage/dam removal projects
- 8 channel/floodplain rehabilitation projects (4 mainstem and 4 tributary)
- 2 in-stream habitat enhancement projects
- 3 streambank stabilization projects
- 4 road-related projects with in-water activities (i.e., road decommissioning with culvert removal)

TRRP is in the process of reinitiating consultation with NMFS to include all project activities described in the Proposed Action (of the Project EA) that were not previously analyzed in the 2020 TRRP BiOp. Project limitations will also be reviewed during the consultation reinitiation to reduce limitations and increase the number of projects that may be implemented in the watershed per year. Refer to the most recent TRRP BiOp when implementing site-specific projects.

2.2.4 Environmental Commitments

Environmental commitments intended to reduce environmental impacts are included in Appendix B of the EA and cover planning, implementation, post implementation, and monitoring. These would be incorporated into site-specific restoration project designs during the planning process. The environmental commitments have been sorted into three different categories: general protection measures (GPMs); design guidelines by activity type; and conservation measures (CMs) by environmental resource.

These environmental commitments were primarily developed based on measures required by the 2020 TRRP BiOp and the 2025 USFWS Statewide Restoration BiOp. Appendix B of the EA provides recommendations to guide project proponents as they develop a list of appropriate environmental commitments. Project proponents should work with the Action Agency and Services to develop an appropriate list of environmental commitments for their site-specific projects.

2.3 National Historic Preservation Act

Federal agencies are required to consider the effects of their actions on historic properties (i.e., cultural resources that rise to a certain level of significance) in compliance with Title 54 USC Section 306108, commonly referred to as Section 106 of the NHPA, and its implementing regulations located at 36 CFR § 800. Section 106 responsibilities include consultation on historic properties with interested parties (e.g., Indian tribes) and affording the Advisory Council on Historic Preservation a reasonable opportunity to comment on findings. Which federal agency, involved in a site-specific project, would serve as the lead federal agency for the Section 106 review would depend on a number of factors including, but not limited to, the following: if any historic infrastructure managed by a particular federal agency is being modified by a project (e.g., the removal of certain in-water structures); if the project will take place on federally-managed land; or if the project is funded by a particular agency. Ultimately, as previously discussed, the federal agencies involved in the site-specific project would determine which agency would lead the Section 106 review.

To complete the Section 106 review for each site-specific project, the following process would be followed:

1. The project proponent would provide a project description detailing all project activities particularly related to any areas of ground disturbance, staging, and/or access routes.
2. The project proponent would work with the lead federal agency for NHPA to develop an area of potential effects (APE).
3. The archaeologists at the lead federal agency would initiate the Section 106 review process and any other cultural resources related regulations relevant to the lead agency, including Tribal Consultation.
4. The project proponent would conduct a cultural resource survey of the APE and provide a report to the lead federal agency or work directly with the lead federal agency to conduct a cultural resource survey and develop a report. In addition to ground surveys, a records review would be performed to determine past archaeological studies within the APE.
5. The lead federal agency would analyze the site-specific project effects to cultural resources and prepare documentation of the findings to complete the Section 106 review. This may include consulting the SHPO. Avoidance, minimization, and mitigation measures to limit project effects would be identified during this process as well.
6. If cultural mitigation is required as part of consultation, the project proponent would work with the lead federal agency to identify potential options. Possible mitigation measures may include modification of site-specific project design or avoidance of cultural areas.

This is the general process for site-specific projects to meet Section 106 requirements. It should be noted that this process can take time (~6-12 months) and project proponents should plan adequate time into project schedules for this process.

It should be noted that for site-specific projects with BLM as the lead federal agency, the California BLM State Protocol Agreement may potentially be utilized for compliance with the NHPA.

2.4 Wild and Scenic Rivers Act

The BLM and USFS manage segments of the Trinity WSR on federal lands they manage and, along with the National Park Service (NPS) for non-federal lands, are responsible for implementing Section 7 of the WSR for the entire Trinity WSR including federal and non-federal lands, which they cooperate to carry out.

When a site-specific project occurs within the proximity of a Wild and Scenic River, Section 7 of the WSR requires review and evaluation of federally assisted water resources projects and determination of effects by the federal river managing agency to ensure that (1) for projects proposed on a WSR, the project would not have an adverse effect on river values (free-flowing condition, water quality, outstandingly remarkable values (ORVs) or (2) for projects proposed above, below, or on a tributary to a WSR, the project would not invade the WSR or unreasonably diminish the WSR's scenic, recreational, and fish and wildlife values.

In addition to designated Trinity WSR, there have been rivers identified by the USFS and BLM as "suitable rivers" under WSR Section 5(d)(1), meaning they were found suitable for potential future addition to the National Wild and Scenic Rivers System. While WSR Section 7 does not apply to these rivers, agency interim measures say that any water resources projects proposed on suitable rivers "shall be analyzed as to their effect on a river's free-flow, water quality, and outstandingly remarkable values, with adverse effects to be prevented to the extent of existing agency authorities (such as special-use authority" (FSH 1909.12, 84.3, item 1). More information on the WSR can be found in Appendix D of the Project EA.

2.4.1 For Projects on WSRs Managed Only by BLM and Within the Scope of the Project EA's Proposed Action

The BLM has performed a Section 7 analysis and made a determination for the WSR they manage within the Project activity area (Appendix F of the EA). BLM determined the implementation of the Project would have an overall beneficial effect to the river's free-flowing condition, water quality, and anadromous fishery ORV. Site-specific projects that are within the scope of the Proposed Action and effects analysis of the EA and are on WSRs managed by BLM do not require further WSR coordination. If a site-specific project does not meet the previously listed criteria, a separate WSR Section 7 review is required as described below. The Authorized Officer will confirm in writing that the WSR Section 7 analysis is adequate and that no adverse effects are expected.

2.4.2 For All Other Projects

To complete WSR review for each site-specific project (regardless of location, even if outside designated Trinity WSR and on federal or non-federal lands) the following process would be followed:

1. The project proponent and/or the federal assisting agency would provide the BLM and the USFS with a project description detailing all project activities and their locations, including a map or description to identify which activities would occur below the ordinary high-water mark. Based on the location, the BLM and the USFS would confer with the National Park Service (NPS) as needed to identify which agency will serve as the federal river managing agency for review.
2. The WSR specialist(s) at the federal river managing agency would review the site-specific project proposal for consistency with agency policies for WSR management and wild and scenic river

management direction from the relevant land management plan(s) and, if applicable, the *South Fork of the Trinity Wild and Scenic Rivers Management Plan*.

- a. For the USFS, WSR management direction is in Forest Service Manual (FSM) 2350. Additionally, for site-specific projects proposed on eligible or suitable rivers, interim measures for protective management are in Forest Service Handbook (FSH) 1909.12, Chapter 80, 84.3; contact the regional wild and scenic rivers program manager to discuss documentation for evaluating water resources projects on eligible or suitable rivers.
 - b. For the BLM, wild and scenic river management direction is provided within Section 2.5.3 Wild and Scenic Rivers of the 2024 NCIP and BLM Manual 6400, Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation, Planning, and Management. Similarly, contact the local Field Office wild and scenic rivers specialist to discuss documentation for evaluating water resources projects on suitable rivers.
3. If the site-specific project is a water resources project subject to Section 7 of the WSRA, the WSR specialist(s) at the federal river managing agency would prepare a Section 7 analysis and determination, using the appropriate evaluation procedure from the WSRA. The Interagency Wild and Scenic Rivers Coordinating Council technical paper *The Wild and Scenic Rivers Act: Section 7* provides additional information.
- a. For the USFS, standards and procedures for evaluating water resources projects are established in Regulation at 36 CFR Part 297 and agency policy in FSM 2354.7. Contact the regional wild and scenic rivers program manager as early as possible to coordinate the regional review and signature process.
 - b. For the BLM, standards and procedures for evaluating water resources projects are also established in Regulation at 36 CFR Part 297 and BLM Manual 6400.
4. The federal river managing agency official would review the Section 7 analysis and determination and sign the determination, then send the signed determination to the project proponent and/or the federal assisting agency. The Section 7 determination from the federal river managing agency is required before federal assistance can be provided.
- a. For the USFS, the appropriate official is identified in FSM 2354.7. In almost all cases, it is the Regional Forester. Contact the regional WSR program manager with questions.
 - b. For the BLM, the appropriate official is the BLM Redding Field Office Manager.
5. The signed Section 7 analysis and determination would be posted on a publicly available website (such as where other project planning documents are posted).
6. The project proponent, federal assisting agency, and river managing agency should cooperate to ensure that all personnel who will be working on the project understand and will follow any WSR-specific rules and commitments. Review and follow any monitoring and reporting requirements.
- a. For the USFS, the STNF is responsible for reporting water resources projects on the Trinity WSR as part of NRM-Wild and Scenic Rivers annual reporting.
 - b. For the BLM, the BLM Redding Field Office would serve as the lead data steward for projects on BLM lands.

2.5 Wilderness Act

Section 4(c) of the Wilderness Act prohibits certain uses in wilderness and wilderness study areas (WSAs) outright (permanent roads and commercial enterprise) but allows others (temporary roads, use of motor vehicles, motorized equipment or motorboats, landing of aircraft, other forms of mechanical transport, structures, or installations) only if they are necessary to meet minimum requirements for the administration of the area for the purposes of the Wilderness Act.

Wilderness managers prepare a Minimum Requirements Analysis (MRA) to evaluate whether a use otherwise prohibited by Section 4(c) needs to occur in wilderness (however, not required for WSAs), and if so, how to accomplish it with the least impact to the wilderness resource. The Minimum Requirements Analysis Framework (MRAF)—the interagency tool that wilderness managers typically use to conduct the MRA—helps to meet the substantive requirement of Section 4(c). The MRAF consists of two steps: Step 1 evaluates whether administrative action may be necessary in wilderness; if so, Step 2 provides guidance for determining the minimum technique, timing, or amount of a prohibited use necessary to address the wilderness stewardship issue at hand. The MRAF’s selected alternative is a determination that represents the minimum requirement necessary to administer the area as wilderness.

To complete Wilderness Act review for each site-specific project, the following process will be followed (steps 3-6 are only applicable to Wildernesses not WSAs):

1. The project proponent will provide the BLM and the USFS with a project description detailing all project activities proposed in wilderness or WSAs including any Section 4(c) uses being considered.
2. The wilderness specialist(s) at the land management agency will review the project proposal for consistency with agency policies for wilderness and WSA management and wilderness management direction from the relevant land management plan(s) and, if applicable, wilderness plan.
 - a. For the USFS, wilderness management direction is in Forest Service Manual (FSM) 2320. Identify if the proposed project would require Chief’s approval (FSM 2323.04b); if so, notify the regional wilderness program manager as early as possible to discuss the Chief’s approval process (see Step 5).
 - b. For the BLM, wilderness management direction is provided in BLM Manual 6340 – Management of BLM Wilderness. Management of WSAs is provided in *BLM Manual 6330-Management of BLM Wilderness Study Areas*. Specific management actions for BLM-managed wilderness and WSAs are identified in Section 2.5.4 *Wilderness, Wilderness Study Areas, and Lands with Wilderness Characteristics* of the 2024 NCIP.
3. The wilderness specialist(s) at the land management agency would use the MRAF to conduct the MRA. The purpose of the MRA is to satisfy the requirements of the Wilderness Act to ensure that if there are any Section 4(c) uses in wilderness it is the minimum necessary to administer the area as wilderness and that wilderness character is preserved. The wilderness specialist may need to work with the project proponent and other resource specialists to develop the alternatives and analysis in the MRAF.
4. The appropriate land management agency official would review and sign the MRAF to select the minimum requirement for Section 4(c) uses, if any, and document any associated monitoring and reporting requirements.

- a. The appropriate official is identified in FSM 2323.04 and 2326.04, depending on the type of activity and Section 4(c) uses involved. In some cases, responsibility may be delegated through regional direction such as the annual letter “Delegation of Authority for Motorized Equipment and Mechanical Transport in Designated Wilderness.” Contact the regional wilderness program manager with questions.
5. For projects in USFS wilderness areas, if Chief’s approval is needed (see FSM 2323.04b and 2326.04a), the forest-level wilderness specialist(s) would work with the regional wilderness program manager to develop the products needed for this process and obtain Chief’s approval before moving forward.
6. The signed MRAF should be posted for public viewing on a publicly available website (such as where other project planning documents are posted).
7. The project proponent and land managing agency should cooperate to ensure that all personnel who will be working in wilderness and WSAs understand and will follow wilderness-specific rules and commitments. Review and follow any monitoring and reporting requirements.
 - a. For the USFS, the forest that serves as the lead data steward for the wilderness area is responsible for reporting on use of motorized equipment and mechanical transport as part of NRM-Wilderness annual reporting. This includes the types, dates, and amounts of use authorized and actual use.
 - b. For the BLM, the BLM Redding Field Office that serves as the lead data steward for wilderness and WSAs is responsible for reporting on use of motorized equipment and mechanical transport as part of NRM-Wilderness annual reporting. This includes the types, dates, and amounts of use authorized and actual use. However, there are no designated wilderness areas on BLM lands for this effort, only one designated WSA (Trinity Alps WSA).

3 Forms and Templates

[Project Information Form](#)⁴

[Supplemental EA Template \(Reclamation\)](#)⁵

[Determination of NEPA Adequacy Template \(BLM\)](#)⁶

[Decision Record Template \(BLM\)](#)⁷

[Condition-Based Management Checklist \(USFS\)](#)⁸

[Decision Notification Template \(USFS\)](#)⁹

4 Frequently Asked Questions

Several clarifying questions for the Project are discussed below:

1. How does the California Environmental Quality Act (CEQA) fit in with the Trinity River Watershed Restoration EA?

The EA was prepared to meet the requirements of NEPA only. However, the CEQA Program EIR for the State Water Resources Control Board Statewide Restoration General Order (SRGO PEIR) is available for site-specific project CEQA compliance. The activities covered by the SRGO PEIR were based on the 2022 USFWS Statewide Restoration BiOp and though there are minor differences in what activities are covered by the Project (e.g., road-related site-specific restoration activities), most site-specific projects will be covered by the SRGO PEIR.

2. How long will the approval process take in order to be cleared to do a project?

The approval process is meant to be streamlined. It would depend on the type of site-specific project being proposed and the lead federal agency process for various environmental compliance components. Much of the environmental compliance approval timeline would be determined by specific processes such as the Section 106 review process and the state and federal permitting process. Early and efficient communication and collaboration combined with a detailed project description and design should lead to a quicker environmental compliance process.

⁴ <https://www.trrp.net/library/document/?id=2681>

⁵ <https://www.trrp.net/library/document/?id=2680>

⁶ <https://www.trrp.net/library/document/?id=2676>

⁷ <https://www.trrp.net/library/document/?id=2677>

⁸ <https://www.trrp.net/library/document/?id=2678>

⁹ <https://www.trrp.net/library/document/?id=2679>

3. Does each site-specific project have to have 100% designs to be proposed?

The site-specific project needs to be designed enough to know if it meets the Project purpose and need, aligns with the covered activities, and will be able to incorporate all applicable environmental commitments into project designs. In addition, the design will have to be far enough along to know if it can meet the requirements of the various regulatory consultations (e.g., 2020 TRRP BiOp, 2025 USFWS Statewide Restoration BiOp, WSR Section 7, and NHPA Section 106).

4. Will the public have the opportunity to provide input on site-specific projects as they are being proposed to be implemented?

These site-specific projects generally include multi-party collaboration for planning and implementation and public notice will be handled by the lead federal agency processes on a case-by-case basis.

5. Are private lands covered in the PEA?

Private lands are included in the analysis provided in the PEA. It should be noted that, just as for federally managed lands, site-specific surveys and analysis is required for individual projects with federal funding.

6. Where can I find more information about past restoration work conducted within the Trinity River basin?

The TRRP website¹⁰ has many resources that provide detailed information about restoration activities that have occurred within the Trinity River basin in the past.

7. Are project activities permitted in designated Wilderness areas?

Project activities may be permitted in designated wilderness areas associated with identifying fish-bearing streams if they are consistent with the Wilderness Act of 1964, USFS policies for wilderness management, and management direction for wilderness management in the land management plan for the STNF. The process to review project activities proposed in wilderness is described in Section 2.5 of this Implementation Plan. Section 4(c) of the Wilderness Act prohibits certain uses in wilderness “except as necessary to meet minimum requirements for the administration of the area for the purpose of [the Wilderness] Act,” including motorized equipment, mechanical transport, landing of aircraft, structures and installations. If the proposal would involve any Section 4(c) uses, the USFS would conduct a Minimum Requirements Analysis (MRA) using the interagency Minimum Requirements Analysis Framework (MRAF) tool. Additionally, certain types of activities can only be approved by the Chief of the Forest Service, including fish and wildlife habitat manipulation and watershed condition improvement.

8. Why do the BLM and USFS have different processes for determining whether site-specific project proposals and effects are within the scope of the EA?

The USFS is using a new approach called Conditions Based Management (CBM). CBM has not yet been adopted by the BLM, therefore BLM will continue to use their Determination of NEPA Adequacy process.

¹⁰ <https://www.trrp.net/>