Appendix G – Pubic Participation and Stakeholder Engagement

1 Public Scoping

1.1 Public Scoping Meetings and Outreach

On November 4, 2022, Bureau of Reclamation's (Reclamation) Trinity River Restoration Program (TRRP or Program), Shasta-Trinity National Forest (Forest), and Bureau of Land Management's (BLM) Redding Field Office released a public scoping announcement to request input from the public on the proposed Watershed Restoration Project. The public scoping period was open from November 4 to December 5, 2022, and the public was invited to provide comments by mail or email to TRRP staff.

At the onset of the public scoping period, notices informing the public of the intent to begin the environmental review process were posted on the TRRP, Reclamation, Forest, and BLM websites and at the TRRP Weaverville office, BLM Redding Field Office, and Forest Field Office. Scoping notices were also mailed and emailed to local landowners and interest groups and published in the Trinity Journal on November 16, 2022.

The TRRP, Forest, and BLM provided the scoping flyer on its websites to outline the proposed watershed restoration project and to receive public input. The Scoping flyer is provided below.

The TRRP, BLM, and Forest hosted a virtual and in-person scoping meeting on November 17, 2022, to outline the Trinity River Watershed Restoration Project (Project), receive public input, and to answer questions. During the meeting, the public asked questions and provided input. Presentation slides and a recording of the November 17, 2022 scoping meeting are available online at https://www.trrp.net/calendar/event/?id=11759. This appendix includes the scoping notice, scoping meeting agenda, and results of the public scoping phase of the Project Environmental Assessment (EA).

The scoping notice and agenda, which are included at the end of this report, were provided to the public either on the agencies' websites or at the November 17, 2022, public meeting.

1.2 Scoping Materials

The following scoping notice and agenda were provided were provided to the public either on the agencies' websites or at the November 17, 2022, public meeting.

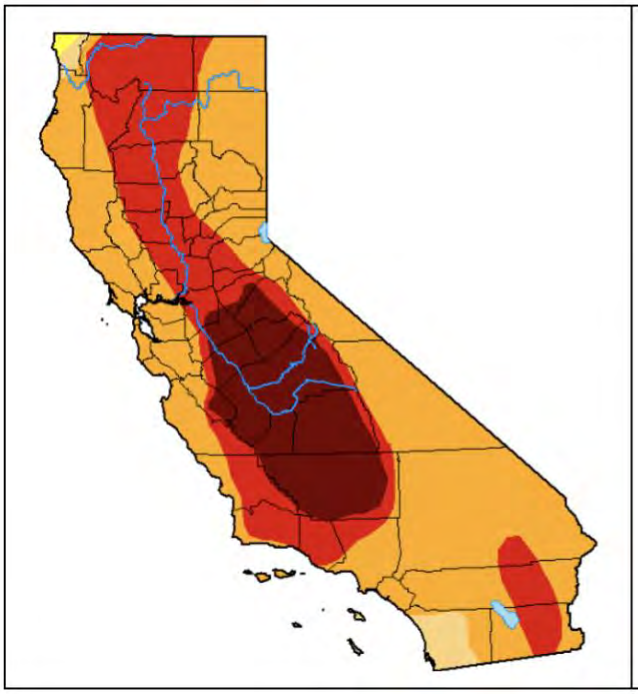
Trinity River Watershed Restoration Project

Programmatic Environmental Assessment

Public Scoping Notice

Background

As of August 2022, more than 97% of California is experiencing severe, extreme and exceptional drought, as well as record high temperatures (see Figure 1). The continuation of warming trends and drought will increasingly stress important regional fisheries and hamper efforts to recover vulnerable fish populations (Isaak et al. 2012).



August 23, 2022

(Released Thursday, Aug. 25, 2022)

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	0.00	100.00	99.76	97.53	43.16	16.57
Last Week 08-16-2022	0.00	100.00	99.76	97.53	43.16	16.57
3 Months Ago 05-24-2022	0.00	100.00	99.86	97.56	59.81	11.59
Start of Calendar Year 01-04-2022	0.00	100.00	99.30	67.62	16.60	0.84
Start of Water Year 09-28-2021	0.00	100.00	100.00	93.93	87.88	45.66
One Year Ago 08-24-2021	0.00	100.00	100.00	95.58	88.37	47.40

Figure 1. California Drought Map (USDA California Climate Hub)

Regional temperatures are expected to warm in all seasons, perhaps with greater summer maximum temperatures and an increased heat wave frequency (Dahl K. et al. 2019). By 2100, temperatures may increase by 2.2 to 5.4 degrees Celsius above temperatures recorded between 1951-1980 (Hilberg et al. 2019a; Hilberg et al. 2019b).

Air temperature is the dominant factor explaining long-term stream temperature trends (82% - 94% of trends) and inter-annual variability (48% - 86% of variability), except during the summer, when discharge accounted for approximately half (52%) of the inter-annual variation in stream temperatures (Isaak et al. 2018). These conditions will not provide the cold-water habitat upon which our present cold water aquatic species depend.

Snowpack in Northern California has long served as a natural form of water storage, and snowmelt has historically provided a cold-water source for aquatic ecosystems and enough water to keep forests hydrated into the summer months. Historic long-term drought resulting in lower snowpack levels means an earlier snowmelt period that results in a longer dry season. This leaves surrounding forest ecosystems water-stressed and more vulnerable in late summer and fall.

Human demands for water are increasing at a time when streams are at all-time low flow levels. Water warms more rapidly in shallow streams that have been depleted from water use demands, reducing and sometimes eliminating suitable cold-water aquatic habitat. Furthermore, sediments from runoff after wildfires and from impaired tributaries and poorly maintained roads can fill lakes and streambeds. This leads to obstructed natural stream flows which adversely affect navigation, recreational use, and valuable aquatic habitat. Sediments often smother fish eggs and the aquatic insect larvae upon which fish prey. The mainstem Trinity River below Trinity Dam and the South Fork Trinity River are sediment impaired, and experience some of these effects from sedimentation (EPA 2001).

The desired outcome for the watershed restoration projects under the PEA could counter several climate-related variables that are impairing the Trinity River watershed. Specific desired outcomes include more accessible cold-water aquatic habitats with effective riparian shade and downed wood fostering a cooler microclimate; and a sediment transport regime that retains the key habitat characteristics to promote the survival and sustainability of cold-water aquatic organisms.

Project Purpose and Need

Projects that support habitat conditions of native aquatic species are essential to recover and sustain natural production of salmon and steelhead within the Trinity River watershed. The purpose of the project is to enhance the quality and quantity of accessible cold-water aquatic habitat and water temperature conditions; and to decrease fine sediment loading through watershed restoration activities. The project is needed to improve fish passage and water temperature conditions.

Proposed Watershed Restoration Activity Area

The activities to be analyzed in the PEA, which are described in more detail below, would occur within the Trinity River watershed (Figure 2).

The intent is to include activities described in the TRRP's 2020 biological opinion issued by the National Marine Fisheries Service (NMFS) for the benefit of federally listed Southern Oregon/Northern California Coast (SONCC) evolutionarily significant unit coho salmon.[1, 2]

[1] The 2020 NMFS biological opinion was issued to comply with Section 7 of the Endangered Species Act, for restoration and rehabilitation activities along the mainstem Trinity River and its tributaries primarily for the federally listed SONCC coho salmon. The biological opinion is available at https://www.trrp.net/library/document/?id=2472.

[2] In terms of USFS lands included within the Proposed Activity Area, the Six Rivers National Forest has been excluded because a similar PEA for aquatic restoration has been completed and can be found at https://www.fs.usda.gov/project/?project=42051.

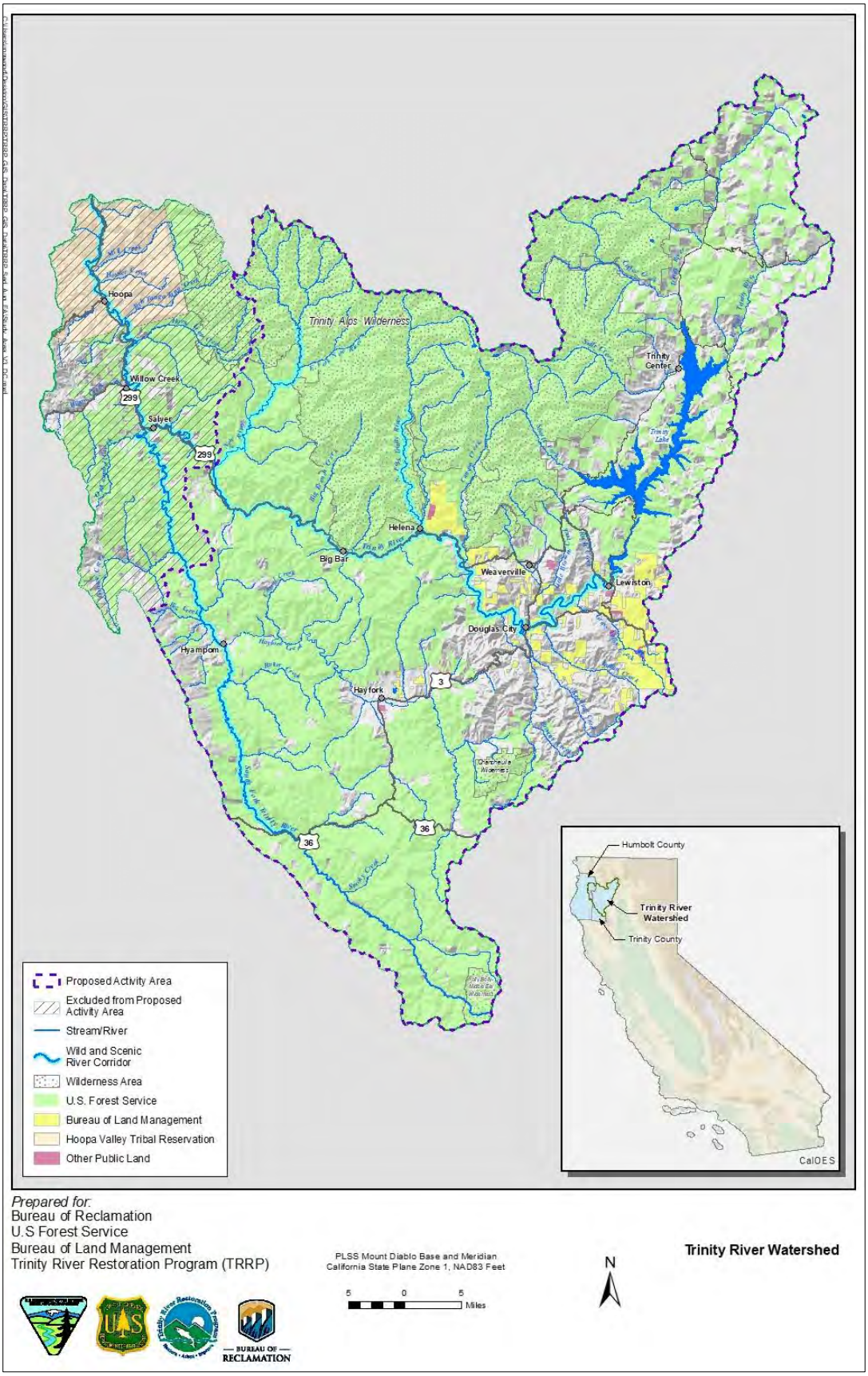


Figure 2. Map of the Trinity River Watershed where restoration activities may occur.

Proposed Activities

The PEA will identify and analyze a suite of instream and riparian restoration activities that are designed to maintain, enhance, and restore instream processes to benefit aquatic species, riparian habitats, and water quality. Activities include instream habitat restoration, native riparian and wetland revegetation/management, fish passage restoration, instream flow restoration, road decommissioning, maintenance, and rehabilitation activities. Figure 3 shows several common restoration activities at Mill Creek.

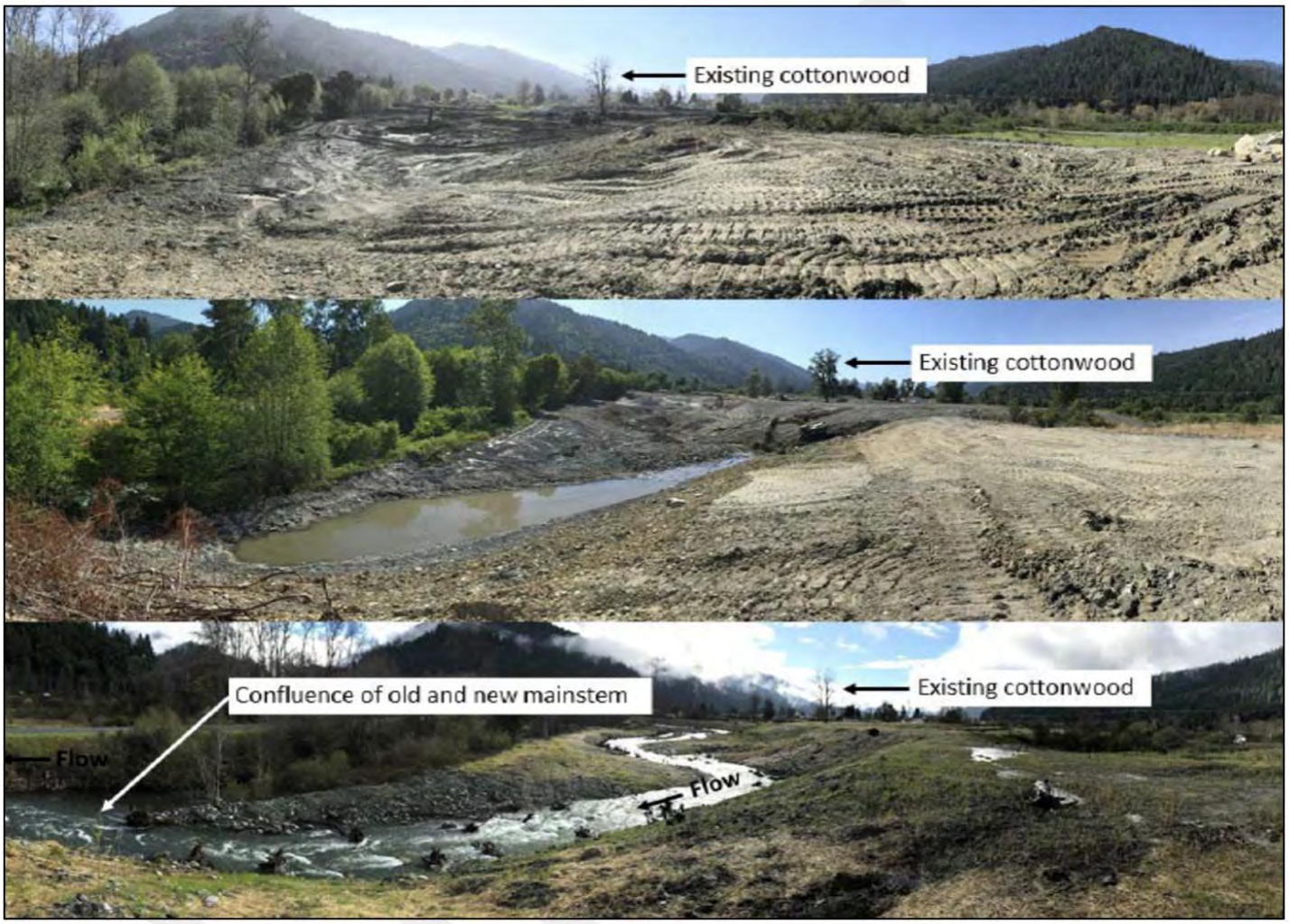


Figure 3. Watershed restoration activities at Mill Creek, during construction (top and middle) and after construction (bottom).

Instream Habitat Restoration

- **Restoration and enhancement of off-channel and side-channel habitat –** These activities would improve aquatic and riparian habitat for fish and wildlife. Habitat restoration and enhancement actions along tributaries and larger in-channel and floodplain rehabilitation projects include installation of habitat elements such as vegetation, large wood, trees with root wads, in-stream boulders, beaver dam analogs, and spawning gravel. These actions would improve aquatic and riparian habitat for fish and wildlife and/or restore the hydrologic, hydraulic, and biogeochemical functions and processes of streams.
- **Bioengineered bank stabilization** – These activities would reduce input of fine sediment, enhance aquatic and riparian habitat, and improve water quality by integrating vegetation into bank protection.
- **Floodplain restoration** – These activities would improve ecosystem function by creating hydrologic connections between streams and floodplains through such measures as breaching and removal of levees, berm and dike setbacks and hydraulic reconnection.

Native Riparian and Wetland Restoration

- **Removal of nonnative invasive species and revegetation with native plants** – These activities would improve watershed functions such as aquatic and riparian habitat for fish and wildlife. Revegetation may occur as a stand-alone project and/or part of larger watershed restoration activities to reduce upslope erosion from past land management practices, including timber harvest, mining, and road construction. Recurring wildfire also contributes to fine sediment and erosion reaching downslope aquatic habitats. Areas affected by fire would be targeted for revegetation.
- **Establishment, restoration, and enhancement of freshwater wetlands** – These activities would create or improve wetland ecological functions.
- **Establishment, restoration, and enhancement of stream and riparian habitat and upslope watershed sites** – These activities would create or restore the functions of streams and riparian areas, including upslope watershed sites that could contribute sediment to streams or disrupt floodplain and riparian functions.
- **Riparian vegetation restoration** – These actions would restore species composition, structural diversity, and resilience to disturbances. Riparian vegetation helps to maintain shade and promote large woody debris recruitment. Where existing vegetation exceeds riparian needs and is deemed hazardous (i.e., fuel, dead or dying vegetation near road) or adversely impacts desired conditions (such as conifers encroachment on hardwoods or riparian vegetation), selective vegetation removal may occur. Removed vegetation would be retained primarily for aquatic habitat support (i.e., large wood structures), erosion control, and soil amendment (e.g., mulching).

Fish Passage Restoration

- **Improvements to stream crossings and fish passage –** These activities would improve upstream and downstream habitat connectivity and allow movement by fish and other species by promoting sustainable stream function. Activities associated with restoring fish passage include improving road crossing (e.g., culverts or bridges) and removal and/or retrofitting barriers (e.g., small dams and diversions).

Instream Flow Restoration

- **Removal of small dams, diversions, flood gates, pilings and other in-water structures** – These activities would improve circulation, flow, and water quality primarily by removing outdated in-stream structures.
- **Water conservation projects** – These activities would reduce low-flow stream diversions on tributary streams through the installation of features such as off-stream storage tanks and ponds and off-channel infrastructure. New systems may include the installation of slow flow systems including trickle fill, solar, and ram pumps; and full forbearance systems to eliminate stream withdrawal during the lowest flow periods. Project activities may include water conservation and efficiency outreach; monitoring to determine low flow thresholds; and designing, permitting, and implementing individualized water conservation systems.

Road Decommissioning, Maintenance, and Rehabilitation Activities

- **Road maintenance activities** – These activities would include work that results in insignificant or discountable effects on coho salmon habitat. Activities may include grading, rocking, and clearing of drainage structures on existing roads. Road-cut, fill-slope, fine sedimentation, and stream channel erosion from aging infrastructures and practices have resulted in poorly maintained roads and are contributing to deterioration of aquatic habitats.
- **Road rehabilitation** – These measures would include replacing undersized culverts with new culverts or bridges capable of accommodating a 100-year storm. Activities would include out sloping, rocking, energy dissipaters, and the addition of new drainage structures to reduce the accumulation of water in inboard ditches.
- **Road decommissioning** – These actions would remove stream-crossing structures, culverts, and Humboldt crossings. Depending on slope, soil type, and other factors, activities could also include reshaping, ripping, seeding, and mulching the road surface. Measures to minimize impacts to aquatic species for road-related work would include working in dry conditions or in isolated waters.

Potential Effects

The Public Draft PEA will analyze potential effects to resources, such as:

- Temporary water turbidity increases during restoration activities
- Temporary disturbances to vegetation and aesthetic values at restoration sites
- Effects on cultural resources and historic properties
- Effects on the aquatic environment and riparian habitat
- Other effects on resources identified during analyses and scoping

Decision to Be Made

Each federal agency's responsible official will sign and issue a separate NEPA decision that is specific to lands being managed, the funding for the potential project, and/or the areas of responsibility under their jurisdiction. The responsible officials will decide whether to implement the proposed action, implement an alternative action that meets the purpose and need, or take no action.

How to Participate in the Scoping Process

You are invited to participate in the Trinity River Watershed Restoration Project PEA by providing comments during the public scoping period. If you have information or analysis that you feel the agencies may not be aware or have issues (points of dispute, debate, or disagreement) regarding the proposed activities, please send

these comments in writing to the address listed below. The agencies will consider all issues brought forward and determine if the proposed action should be adjusted or other alternatives be developed.

Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered; however, anonymous comments will not allow the agencies to provide the commentor with subsequent environmental documents.

To ensure your comments can be fully considered by the agencies, please provide all comments by the close of business on December 5, 2022.

- Send your comments via mail to:

  Brandt Gutermuth
  C/O TRRP
  P.O. Box 1300
  Weaverville, CA 96093

  Or send your comments via email to:

  info@trrp.net**.**

- For all submittals, please include *"Watershed Restoration Programmatic EA"* in the subject line with the following information:
  - Your name and address (telephone number and email address are also suggested).
  - Project-specific comments about the proposed action. Please include supporting information that would help identify issues, develop alternatives to respond to those issues, or predict the environmental effects of the proposal.
- A public scoping meeting will be held, and can be attended in-person or virtually, on Thursday, November 17, 2022. Details about the meeting and how to participate are available on the project website: https://www.trrp.net/restoration/watershed-activities/watershed-ea/.
- Your input will be used as a part of our scoping process to help identify issues and frame the analysis.
- The Draft PEA will be advertised and available for review in the Fall of 2023. Proposed Project Schedule.

Works Cited

Dahl K., E. Spanger-Siegfried, R. Licker, A. Caldas, J. Abatzoglou, N. Mailloux, R. Cleetus, and S. Udvardy. July 16, 2019. *Killer Heat in the United States: Climate Choices and the Future of Dangerously Hot Days.* (Union of Concerned Scientists). https://apo.org.au/node/248481.

Hilberg, L.E., W.A. Reynier, and J.M. Kershner. 2019a. *Mixed Conifer and Ponderosa Forests: Northern California Climate Change Vulnerability Assessment Synthesis.* EcoAdapt (Bainbridge Island, WA). https://www.cakex.org/documents/mixed-conifer-ponderosa-forests-climate-change-vulnerability-assessment-northern-california.

---. 2019b. *Mixed Evergreen Forests: Northern California Climate Change Vulnerability Assessment Synthesis.* EcoAdapt (Bainbridge Island, WA). https://www.cakex.org/documents/mixed-evergreen-forests-climate-change-vulnerability-assessment-northern-california.

Isaak, D.J., C.H. Luce, D.L. Horan, G.L. Chandler, S.P. Wollrab, and D.E. Nagel. 2018. "Global Warming of Salmon and Trout Rivers in the Northwestern U.S.: Road to Ruin or Path Through Purgatory?" *Transactions of the American Fisheries Society* 147 (3): 566-587. https://doi.org/10.1002/tafs.10059.

Isaak, D.J., S. Wollrab, D. Horan, and G. Chandler. 2012. "Climate Change Effects on Stream and River Temperatures Across the Northwest U.S. from 1980–2009 and Implications for Salmonid Fishes." *Climate Change* 113: 499-524. https://doi.org/10.1007/s10584-011-0326-z.

U.S. Environmental Protection Agency (EPA), Region IX. 2001. *Trinity River Total Maximum Daily Load for Sediment.* https://archive.epa.gov/region09/water/archive/tmdl/trinity/finaltrinitytmdl.pdf.

Trinity River Restoration Program
Winter Flow Variability Project
Programmatic Environmental Assessment
Public Scoping Meeting

Thursday November 17, 2022 – 5:30-7:30 pm

In-Person and Virtual Public Scoping Meeting

To attend in-person: TRRP Office Conference Room, 1313 S. Main St, Weaverville, CA

To attend virtually: TEAMS LINK

Meeting ID: 253 747 272 227

Meeting Password: R6Ue99

To attend via telephone: 831-256-7142 code 708645838#

AGENDA

5:30 PM **Meeting Guidelines:** Emily Thorn, Ironwood Consulting

5:35 PM **Introduction:** Mike Dixon, TRRP Executive Director

- Purpose of this meeting
- Introduction of the Program Partners and Meeting Participants
- Trinity River Restoration Program (TRRP) Background

5:45 PM **Objectives: Overall and Proposed Project** Chad Abel, TRRP Implementation Branch Chief

Purpose and Need

Background

Proposed Watershed Restoration Activity Area

Proposed Activities

6:05 PM **Environmental Compliance:** Brandt Gutermuth, TRRP Environmental Scientist

- Agency Collaboration
- Schedule
- How to submit questions or comments

6:15 PM **Discussion - Question/Answer period**

Copies of the Scoping Notice are available for review on the TRRP website at https://www.trrp.net/restoration/watershed-activities/watershed-ea/.

Contact information:

Chad Abel (TRRP Implementation Branch Chief)	530-739-8257; ceabel@usbr.gov
Brandt Gutermuth (TRRP Environmental Scientist)	530-739-2802; fgutermuth@usbr.gov
Chad Endicott (BLM Planning and Environmental Specialist)	530-224-2140; cendicott@blm.gov
Joe Rodarme (USFS Environmental Coordinator)	530-226-2388; joseph.rodarme@usda.gov

TEAMS VIRTUAL MEETING INFORMATION

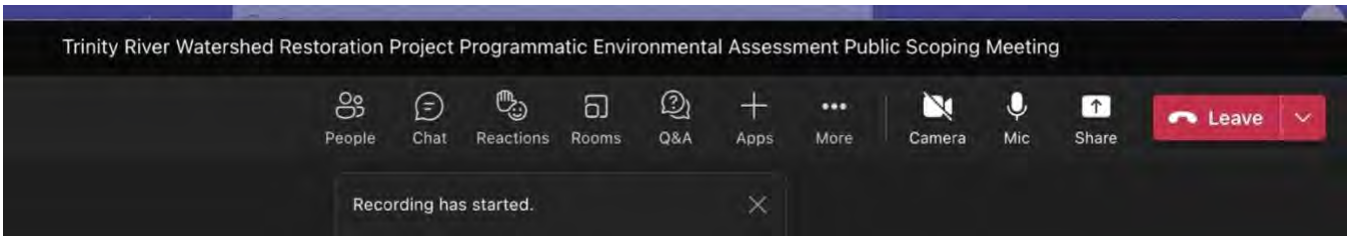
Join via web using MS Teams on your browser:

- MS Teams virtual meeting link
- Meeting ID: 253 747 272 227
- Meeting Password: R6Ue99

Attendees can join by selecting the meeting link above and your web browser should automatically open, and you will be prompted to use the MS Teams app or your web browser. Choose whichever method you prefer. You'll see different instructions based on how you join the event (from the Teams app or through your web browser).

Participating in the Live Event

- Please mute your microphone during presentations and while others are speaking.
- To conserve bandwidth, please turn off your camera unless you are speaking.
- At any point during the meeting, you can type questions in the Q&A panel by clicking on the "Q&A" button on the top of the screen. To ask a question, type your question in the compose box (located at the bottom of the panel), and then select the "Send" button or icon. Please be aware that all attendees and presenters will be able to see your name/identity on the question. Typed questions and comments will be read by the moderator during the Q&A session.
- If you wish to ask a question during the Q&A session, please "raise" your hand using the "Reactions" button on the top of the screen and wait to be called upon.
- Spoken comments and questions will be kept to a 3 minute limit in order to allow all of those who wish to speak the opportunity.
- If you wish to leave the meeting, you can do so at any time using the "Leave" button on the panel.



1.3 Public Scoping Results

During public scoping for this project, TRRP received eight comment submissions (three emails and five letters) from eight different individuals or groups, of which three were anonymous. During the public meeting, six members of the public attended either in-person or virtually with some verbal comments provided. The verbal comments and written submissions were read and/or considered for substantive comments about the proposed project. Letters or comments that merely expressed support for the project were appreciated but were not considered substantive. Scoping comments were reviewed and categorized by principal issue of concern (topics).

Thirteen topics were identified across the comments:

1. Concern for the lower Trinity River and the South Fork of the Trinity River
2. Cultural Resources
3. Cumulative effects
4. Fisheries
5. Land Use
6. Public and agency input and outreach
7. Recreation
8. Requested specific information to be in the EA
9. Requested additional information about the project
10. Special status species
11. Tribal consultation
12. Vegetation (in general, riparian habitat, and wildfire effects)
13. Wildlife

Comment topics and corresponding comments for each individual or group of commenters as well as where the comment topic is addressed in the EA are summarized in Table G-1.

Table G-1. Summary of scoping comments by individual commenters.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Anonymous	Livestock grazing	I enthusiastically support all efforts to restore ecological systems and processes and make them more resilient to climate change and drought. Because riparian habitats are especially sensitive to cattle grazing. I hope that cattle will be excluded from these habitats. I also hope that any harmful dredging for gold in the river will be prohibited.	Thank you for your comment. Livestock grazing and mining activities are addressed either in the proposed action and project design features, along with the applicable land management plans. See Table 5-1 of the EA for more information about resources eliminated from analysis.
Anonymous	Climate Change and livestock grazing	Please carefully review the attachments that describe the climate change related and other adverse impacts from public lands livestock grazing.	Climate change is analyzed in Section 5.7 of the EA. Livestock grazing and mining activities are addressed either in the proposed action and project design features, along with the applicable land management plans. See Table 5-1 of the EA for more information about resources eliminated from analysis.
Anonymous	Livestock grazing	I hope that BLM won't work at cross purposes by restoring habitats while simultaneously allowing livestock grazing to harm those same habitats. I commend BLM for this worthwhile proposed project, and I wish BLM much success with it.	Livestock grazing and mining activities are addressed either in the proposed action and project design features, along with the applicable land management plans. See Table 5-1 of the EA for more information about resources eliminated from analysis.
Baker, Kimberly (EPIC - Environmental Protection Information Center) and Glass, Larry (SAFE Alternative for our Forest Environment	Cultural resources	Decision makers must have regular, meaningful and robust consultation with all affected Tribes. Please see this January 26, 2021, Memorandum concerning Tribal Consultation and Strengthening Nation-to-Nation Relationships.	Tribal consultation will occur in accordance with all applicable laws, regulations, and policies.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Baker, Kimberly (EPIC - Environmental Protection Information Center) and Glass, Larry (SAFE Alternative for our Forest Environment (continued)	Cumulative effects	How will the cumulative effects from other, past, present and future projects on private, public and Tribally managed lands be considered and analyzed for each individual project carried out under the EA? How will the public and decision makers be made aware of the cumulative effects analysis? Please provide this information in the EA.	Tribal land is not included in the project area. Cumulative effects are analyzed in Section 6 of the EA.
	Land Use	The Northwest Forest Plan and with Shasta-Trinity Land Resource Management Plan (LRMP) standards and guidelines must be followed. There are multiple animal and plant species, management areas and assessments that must be considered, analyzed and incorporated into each individual project proposed under the EA. For instance, Watershed Analyses, Late Successional Reserve (LSR) Assessments include recommendations that must guide project planning within the Shasta-Trinity National Forest. Please describe how each project will address these requirements.	See Appendix D of the EA for a discussion of all applicable laws and regulations that the proposed project is subject.
	Request for specific information in the EA	The programmatic approach apEArs to be all encompassing and without limits, which is problematic in impaired watersheds that are vital to the survival of imperiled species. Please provide specific targets and limits, in acres, miles or number of projects on a yearly basis. We urge the Restoration Program to include prioritized areas and site specific goals in the EA. Please provide some explicit spatial and temporal boundaries to greatly decrease the level of uncertainty and risk overall.	See Section 4 for a full description of the activities including limits and requirements; and Appendix B for all environmental commitments (ECs) to which projects are subject.
	Request for specific information in the EA	Please detail how the timing of treatments would be incorporating into project planning. Each plant and animal species has unique life cycle. To add to the uncertainty of risk, climatic shifts will bring changing weather patterns. Please describe how these factors will be considered and mitigated.	See Section 4 for a full description of the activities including timing of activities; and Appendix B for all environmental commitments (ECs) to which projects are subject.
	Request for specific information in the EA	The EA should describe how these considerations would be documented and shared with the public prior to any decision under the EA. How will Tier 1 key watersheds and the Watershed Condition Framework influence project prioritization? How will each project be documented to attain the Aquatic Conservation Strategy (ACS) objectives? We are concerned that the broad programmatic approach would overlook these necessities.	See Appendix A of the EA for a detailed discussion about implementation of specific projects; and Appendix D for a discussion of all applicable laws and regulations that the proposed project is subject.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Alternative for our Forest Environment	Request for specific information in the EA	The forthcoming EA should include real data and examples of past monitoring and reporting efforts. Where can the public access this information? How has the program learned from past studies, projects and monitoring efforts within the watersheds? What worked well? What did not? What were the impacts and effects to fish and water quality? What is the level of work the program has accomplished? Please provide some specific examples. These learned experiences and monitoring studies should inform the EA.	See Section 5 of the EA and Appendices I through M for detailed analysis of resources considered and analyzed in the EA for adverse and beneficial impacts from restoration.
	Request for specific information in the EA	Please also include monitoring, documentation and reporting requirements for project authorized under this EA.	See Appendix A of the EA for a detailed discussion about implementation of specific projects.
	Request for specific information in the EA	Given the widespread level of uncertainty there must be real data to inform the EA and to meet NEPA's "hard look" requirement. Please provide this necessary information in the EA and describe what monitoring, documenting and reporting efforts will be included in each individual project under the EA.	See Appendix A of the EA for a detailed discussion about implementation of specific projects.
	Request for specific information in the EA	In summary, given the level of significant issues, the uncertainty and level of risk, we request that the EA: Provide some explicit spatial and temporal boundaries, Explain how the cumulative effects from other projects will be considered, Detail how the timing of treatments would be incorporating into project planning, Describe how each project will address Northwest Forest Plan and LRMP standards and guidelines, Describe how each project will incorporate Watershed Analyses, LSR Assessments and Recovery Plans, Drop road construction, any commercial logging and the use of heavy equipment in Riparian Reserves for fuels reduction from the project proposal, Provide limitations for road maintenance, Include substantive data and examples of past monitoring, studies and reporting efforts, Include monitoring and reporting requirements for projects under the EA, Provide real data to meet NEPA's "hard look" requirement, Include robust and meaningful consultation with all affected Tribes, Guarantee that invasive species will not be spread and Provide details on the site-specific authorization and public notice and participation process.	See Section 4 for a full description of the activities including limits and requirements; and Appendix B for all environmental commitments (ECs) to which projects are subject. See Appendix A of the EA for a detailed discussion about implementation of specific projects.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Alternative for our Forest Environment (continued)	Requests additional information	Please provide a detailed description of when, why and how future decisions will be released and what the timing of the public notice and participation process will be, not just for future decisions but also for any site-specific project authorized under this EA.	See Appendix A of the EA for a detailed discussion about implementation of specific projects.
	Special status species	The scoping notice references the 2020 NMFS biological opinion (BO), which was issued to comply with Section 7 of the Endangered Species Act, for restoration and rehabilitation activities along the mainstem Trinity River and its tributaries primarily for the federally listed SONCC coho salmon. The BO states, "The TRRP will monitor and report on projects implemented under the TRRP Programmatic BO for TRRP-funded projects and for restoration projects in the action area (i.e., Trinity River watershed for restoration projects and Trinity River watershed and the Lower Klamath River watershed for monitoring and research) that the TRRP adopts into the TRRP Programmatic BO. TRRP will be responsible for collating all the monitoring and reporting to NMFS." The BO referenced five different studies to monitor restoration effectiveness. The requirement of tracking and reporting to NMFS was also included in the BO.	TRRP tracks projects that are completed under the 2020 BiOp and reports to NMFS on an annual basis for compliance under Section 7 of the ESA. See Section 4 for a full description of the activities including limits and requirements; and Appendix B for all environmental commitments (ECs) to which projects are subject. See Appendix D for a discussion of all applicable laws and regulations that the proposed project is subject.
	Vegetation	Our members have brought to our attention that past projects on the Trinity River, implemented by/for the TRRP have actually increased the spread of invasive plant species. We are very concerned that soil and ground disturbance provides the optimal opportunity for invasive plant species to flourish. Because the removal and treatment of invasive species is one of the restoration activities proposed, the EA should detail how invasive plants would be removed and what monitoring will be included to ensure that treatments are not causing the spread of this very real threat.	See Section 5.4 and Appendix J for a detailed discussion of the proposed project on the spread of noxious weeds.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Alternative for our Forest Environment (continued)	Vegetation (riparian habitat)	While our organizations support the purpose and need of the project we have concerns regarding the scope, scale, significant issues and uncertainty of affects, which should be addressed in the project analysis. Riparian Reserves are some of the most fragile and sensitive ecosystems that serve multiple functions vital to all life in these river environments. While restoration from the decades of abuse is important, it is also important that the project does not cause undue stress and more harm. Additional decisions, public participation, site-specific surveys, monitoring, documentation and reporting as well as consultation with associated agencies and Tribes prior to implementation must occur and should be detailed in the forthcoming project analysis and decision.	See Section 5.4 and Appendix J for a detailed discussion of the proposed project on the Riparian Reserves. See Appendix A of the EA for a detailed discussion about implementation of specific projects and Appendix B for all environmental commitments (ECs) to which projects are subject.
	Water quality and fisheries	What water quality and fisheries efforts are currently happening in these watersheds? What water quality and fisheries efforts will be included for treatments and projects carried out under the EA? How are TMDL targets and restrictions being measured and documented? How will this information be included and incorporated into the EA?	See Section 5.4 and Appendix J for a detailed discussion of the proposed project on wetlands and Section 5.2 and Appendix I for water quality.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Alternative for our Forest Environment (continued)	Land use and vegetation (riparian habitat)	The scoping notice references the Six Rivers Aquatic Programmatic EA. We would like to point out that this effort specifically excluded road maintenance and construction and authorized the utilization of existing roads only. The creation of roads, especially within Riparian Reserves is contrary to multiple ACS objectives and could have long-term detrimental effects to soil porosity and riparian ecosystem function. Roads are the largest contributor of sediment to our streams and rivers. Road construction, commercial logging and the use of heavy equipment for "fuels reduction" are both publicly and scientifically controversial. These activities increase the risk and uncertainty of effect and elevate the need for an individualized NEPA process and separate environmental analysis. Please clarify that the EA is not intended for commercial logging. We urge project planners to drop road construction and the use of heavy equipment in Riparian Reserves for fuels reduction from the project proposal. Further, without some scope and scale associated for the EA the level of "road maintenance" is also concerning. The agencies already have Categorical Exclusions for road maintenance; therefore the EA should drop road maintenance or provide a particular amount or level of treating roads.	See Section 4 for a full description of the activities including limits and requirements; and Appendix B for all environmental commitments (ECs) to which projects are subject.
Boggs, Denise (Conservation Congress)	Cumulative effects	We encourage the agencies to be honest and to disclose indirect, direct and cumulative impacts. As the scoping notice stated, climate change may make it impossible to attain some of the goals of this project, and if logging, grazing, and road construction aren't addressed, they will also limit the success of this project.	See Section 5 and 6 of the EA for a discussion of all impacts; and Appendices I through M for detailed analysis of resources considered and analyzed in the EA for adverse and beneficial impacts from restoration.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Boggs, Denise (Conservation Congress) (continued)	Land use	While it is admirable for the agencies to want to improve aquatic habitat to support recovery of diminished salmon and steelhead populations, the program will not be successful if the agencies refuse to address what is exacerbating these problems. While the Trinity and Lewiston dams initially caused many problems; timber harvesting, livestock grazing, and road construction compound existing problems. The EA should look at land management activities that are interfering with the potential success of this program, and make recommendations to remedy them. Agencies have the authority to avoid areas for logging, grazing and road construction to aid in the recovery of listed species. We encourage them to do so.	See Section 5 and 6 of the EA for a discussion of all impacts; and Appendices I through M for detailed analysis of resources considered and analyzed in the EA for adverse and beneficial impacts from restoration.
	Land use	We are also concerned about any dewatering of streams that may be occurring due to marijuana plantations on public lands. These areas should be mapped, the authorities notified, and the plantations destroyed.	See Sections 5 and 6; and Appendices I through M for detailed analysis of resources considered and analyzed in the EA for adverse and beneficial impacts from restoration.
	Special status species	In addition, we are concerned about the removal of any late-successional habitat in or near riparian areas that may be used by Northern Spotted Owls or fishers. We recommend surveys be conducted before removal of any of this habitat.	See Sections 5.5, 5.5, and 5.6 and Appendices J, K, and L for discussions of impacts to vegetation and sensitive species.
Burr, Ben (Blue Ribbon Coalition)	Land Use and Vegetation (wildfire effects)	Wilderness and areas with restrictive management without many anthropogenic disturbances are not conducive to wildlife vitality. Wilderness already makes up a large portion of the area. BRC strongly encourages any plan revisions to strongly consider removing any wilderness characteristic areas and pursue forest fire mitigation projects that will ultimately help protect the species.	See Appendix F for a detailed discussion about Wilderness impacts; and See Sections 5.5, 5.5, and 5.6 and Appendices J, K, and L for discussions of impacts to vegetation and wildlife.
	Recreation	We would like to add our support to any comment submitted by any other individuals or organizations that advocate for motorized use and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.	See Table 5-1 of the EA for more information about resources eliminated from analysis.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Burr, Ben (Blue Ribbon Coalition) (continued)	Recreation and socioeconomics	Local communities rely on recreation for economic opportunities. There has been a surge of use throughout the nation on public lands as well as in the Trinity River area. Local groups have worked hard to put the area on the map so that they could reap the economic benefits. Closing any roads or areas to recreation even temporarily does hinder economic opportunity and the agencies should be sensitive to this.	See Table 5-1 of the EA for more information about resources eliminated from analysis and Section 4 for description of the proposed activities.
	Vegetation (wildfire effects)	BRC supports the broad project objectives to keep public lands and watersheds healthy and reduce the risk of wildland fires. We recommend using commercial treatment in the maximum amount of land possible. Best available science should be used in making these decisions. Past wildfires that have burned rampant because of the lack of maintenance and vegetation projects should be looked at when making these decisions. The removal of hazardous trees and fuel loading will benefit the overall future of these public lands. Wildfire is a large cause of warming temperatures that are affecting waters in California therefore land agencies must do all they can to prevent these large wildfires.	See Table 5-1 of the EA for more information about resources eliminated from analysis and Section 4 for description of the proposed activities and Section 5 for a discussion of resource impacts including climate change.
	Vegetation (wildfire effects), wildlife, land use	Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the agencies in properly managing these lands to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage vegetation to prevent wildfires. In order to adequately manage these areas, roads are a critical component. Roads not only provide access to carry-out management projects but also act as a natural fire barrier.	See Table 5-1 of the EA for more information about resources eliminated from analysis and Section 4 for description of the proposed activities and Section 5 for a discussion of resource impacts including wildfire.
Magdaleno, Dena (Elder - Tsnugwe Council)	Concerned about the lower Trinity River and the South Fork of the Trinity River and special status species	Finally, we live in western Trinity County; our people live in the Lower Trinity River community and on the South Fork of the Trinity. We have seen no meaningful projects completed in our part of the river system. As you are aware there are spawning Coho in the South Fork and at Old Campbell Creek near the mouth of the South Fork. We would like to understand why are all the projects at or near the headwaters instead of an areas where there has been a healthy Coho population that is now in decline and listed for the Spring run as was stated at your meeting.	The EA would cover projects throughout the Watershed including in the lower Trinity River. See Section 1.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Magdaleno, Dena (Elder - Tsnugwe Council) (continued)	Public and agency input and outreach	We, the Tsnungwe Council, have reviewed the "Watershed Restoration Programmatic EA" and one of our Elders, Dena Magdaleno, attended your recent Community meeting, where although there were many in attendance, there were only two members of the public. This is our first concern. Shouldn't there be a wide range of input regarding a comprehensive plan that all agencies involved will be using to make short and long range decisions about our rivers? Simply holding the meeting does not seem adequate. Unless there already has been ample input. But the type and number of comments from the community were not discussed.	There will be additional public notice and opportunities to provide input on a site-specific basis, which will be carried out by the lead federal agency for the project. See Appendix A.
	Tribal consultation	Additionally, the Tsnungwe were not informed or consulted regarding this important document. Information about how to contact us as listed at a tribe in Trinity County is available at the Native American Heritage Commission. As you are aware opportunity for consultation is required with all tribes by the State of California on public lands and waterways.	Tribal Consultation will occur on a project-specific basis by the lead federal agency. See Appendix A.
	Water resources and fisheries	The Tsnungwe Council agrees with the TRRP's statement that returning more flows to the river will restore it. Increased flows must be scheduled to help restore more natural processes to the river. Putting more water in the river will heal the river and bring back the fish. We care about and depend on the rivers and fish in them. They are part of who we are. There need to be more proactive measures taken to protect them both. State and federal agencies installed the dams, have all the funding, and control when it comes to our water and the decline of our fish. We need to do a better job.	Thank you for your support of water conservation measures. See Section 4 for details about proposed project activities, including water conservation projects.
Wheeler, Tom (EPIC)	Vegetation	Will herbicides be used for the proposed project?	The EA would not authorize the use of herbicides as part of the project. See Section 5.4 and Appendix J for a discussion of proposed project effects on vegetation resources.

2 Stakeholder Engagement

2.1 Stakeholder Meetings and Outreach

The TRRP and coordinating agencies conducted stakeholder engagement at several junctures during the Project planning and scoping process to solicit and incorporate feedback from restoration implementors. The aim of the engagement was to inform the proposed activities and the process by which the EA and the implementation of site-specific projects would occur.

On May 18, 2023, a stakeholder scoping meeting at the TRRP offices in Weaverville was convened and lead by TRRP, USFS, and the BLM. The meeting was attended by restoration implementors and funding agencies. The information and feedback from the meeting was used by TRRP, USFS, and BLM to revise and refine the proposed activities presented in the scoping notice to help capture the range of potential restoration activities that have and may occur in the watershed.

In December 2023, TRRP sent a follow-up survey to the stakeholders and implementers to request additional feedback on the proposed project and tiered permitting process. The survey was accompanied by a draft version of the Activity Cards that are in Appendix H of the EA.

2.2 Stakeholder Engagement Results

The questions and the responses from the three implementors that provided feedback are in Table G-2.

Table G-2. Implementor Survey and Responses

Survey Question	Responses
What is your restoration "dream project" in the Trinity Watershed, if funding and resources were not an issue?	• Monitoring: baseline, instream aquatic habitat, fish presence, and more. The common theme in funding opportunities is to not fund long term monitoring. However, most of the funders want to see it done. Having good data would help restorationists develop better projects. • To fill all the streams and rivers with LWD [large woody debris] to match preindustrial volumes. • Hayfork Creek Stage 0, fish passage around Trinity Dam, better water management of flows, seeding juvenile salmon through the SFTR watershed (hatchbox)
Would any of your organization's proposed activities (included in the Activity Cards), occur within upland areas that are not directly adjacent to streams?	• Potentially • Yes
Would any of your organization's proposed activities (included in the Activity Cards), occur within upland areas that are not directly adjacent to streams?	• Restoration and Enhancement of Off-Channel and Side-Channel Habitat
What types of activities (from the Activity Cards) would your organization be likely to implement? In the text box, what is the maximum number of restoration projects for each activity type that your organization would want to complete in a year, if funds and resources were available?	• Floodplain restoration • Removal of Retrofitting of Fish Passage Barriers, Small Dams, Flood Gates, Pilings and Other In-Water Structures • Water Conservation Projects • Salmon Carcass Placement • Bioengineered Bank Stabilization • Aquatic, Wetland, Riparian, and Upslope Habitat Enhancement Including Removal of Nonnative Invasive Species and Revegetation with Native Plants. • Road Decommissioning, Maintenance, and Rehabilitation • Projects often include multiple activity types. It is tough to estimate the maximum over any given year. For activity types, except for Salmon Carcass Placement, it should be no more than 3 per year. For salmon carcass placement, it would be between 6-8 per year. • 10 projects/year • Stabilization: 2 (typically coincides with Restoration and Enhancement of Off-Channel and Side Channel Habitat) Habitat Enhancement: 2 (typically coincides with Restoration and Enhancement of Off-Channel and Side Channel Habitat) Road Work: 1

Survey Question	Responses
What is inhibiting more projects from getting on the ground? What could help make project processes (planning/design/implementation) more streamlined, more efficient?	• Timely engagement of regulatory agencies. Some are very easily accessible and easy to engage. However, there are some that are difficult to reach and engage in project environmental compliance discussions in a timely manner. Having early, committed coordination between federal agencies/landowners/regulators would make a notable difference in the efficiency and timeliness of project completion. • NEPA and CEQA • Archeological surveys (on very small scale projects), funding, project partners
Is there a restoration project activity that your organization would like to implement that is not covered in the Activity Cards? If so, please describe.	• Yes, tree tipping and placement of large wood via helicopter loading (heliwood loading) • Tributary mouth manual reconnection, meadow restoration, upgrade/improvement of diversion structures. See Activity Cards for more information.
Do you believe that having the Trinity Watershed Restoration EA available to meet your environmental compliance requirements will help your organization's projects become more cost-effective (particularly for the planning/design phase), hopefully leading to better funded implementation? If this is not the case, please tell us why.	• If it is well crafted to include project work, timing, etc., use of the TR Watershed Restoration EA should help reduce time spent on environmental compliance.
Are you aware of any fire resiliency funds available for watershed restoration activities? (Noting that the proposed activity categories are focused on watershed restoration and do not specifically include fire resiliency activities).	• https://www.nfwf.org/programs/northern-california-forests-and-watersheds/california-forests-large-watershed-planning-grants-2024-request-proposals • Forest Thinning and Road side fuel reduction

Survey Question	Responses
Please add any other questions, comments or concerns about the watershed restoration projects.	• These monitoring metrics seem to suggest that the volume and flow instream be measured. There are so many factors that affect instream volumes that tying the success or outcomes of some water conservation projects to that metric wouldn't be appropriate. For example, persuading a landowner to install storage for and use water collected during the wet season rather than divert during the dry season is something that is measured/monitored by recording (via water meters) the volume collected during the wet season and to help verify that no diversions occurred during the forbearance season. Strictly speaking, it's not saving much water over the course of any given water year, but rather isolating withdrawals to a wetter period. Suggest expanding this to include alternative metrics to accommodate multiple types of water conservation projects that aren't necessarily tied to other factors outside of the control of the project that might be affecting the volume of instream flow during the dry season. 2) For road rehabilitation work, suggest adding "or features" after "... the addition of new drainage structures" because structures implies culverts but doesn't seem to include rolling and critical dips, which are a very important tool in that type of work. Changing monitoring metrics to Number of culverts, stream crossings, or drainage features replaced would be advisable. 3) Timing of work, which is similar for most activity types: Currently the language in the Activity Cards limit work to end by Oct 15 of each year, except for intermittent streams. The reality, particularly in the more frequent drought conditions that we have been experiencing, is that sometimes rains sufficient to create favorable salmonid migration conditions that come by mid-Oct. The difference between instream conditions at a specific project site on Oct 1st versus Oct 20th in the same year can sometimes be indiscernible. Those extra days can make a huge difference. Further, in the last 15 years or so, there have been many years where extremely dry summer conditions result in critically high fire risk, which creates a reluctance to do certain types of heavy equipment work for fear of starting a fire in forested or grassy restoration project locations. In late fall, cooler temperatures and low water instream conditions often make for ideal construction windows. It would be helpful to revise the language to allow for those scenarios where conditions warrant. Work within a stream zone already has numerous required protocols including fish screening and best management practices (BMPs). Upslope work has several BMPs to protect water quality. Project proponents already coordinate with regulatory agencies closely throughout project implementation. Therefore, any concerns about weather or instream conditions in the latter half of October can be addressed with appropriate oversight. These regulatory agencies have biologists on staff that regularly observe conditions and should be well prepared to discuss and evaluate concerns with pursuing instream work past Oct 15, even in perennial streams. • I'm concerned that the Activity Cards do not encompass all restoration activities and methods. See Activity Cards (Appendix H)

3 Public Comments on the Draft EA

3.1 Public Draft EA Comment Period

An in-person open house for the public took place on March 1, 2025, at 4:00 p.m. Pacific Standard Time at the Weaverville Hotel in Weaverville, California. Information about the Draft EA and the public meeting is available on the TRRP's website (see https://www.trrp.net/restoration/watershed-activities/watershed-ea/) Trinity River Watershed Restoration Project page.

Consistent with Reclamation and BLM agency guidance, public review of the Draft EA began when the agencies posted the document to their websites on March 28, 2025. The USFS public review period began when notice was published in *Redding Record Searchlight*, which is the paper of record, on April 1, 2025. The document was circulated to local, state, and federal agencies and to interested organizations and individuals for a 30-day comment period. Public review of the Draft EA/IS ended on May 1, 2025.

Copies of the Draft and Final EA/IS are available for review on the following websites:

- TRRP's website at https://www.trrp.net/restoration/watershed-activities/watershed-ea/
- BLM's website at https://eplanning.blm.gov/eplanning-ui/project/2036707/510.

3.2 Public Draft EA Comments and Responses

Five comment letters on the Draft EA were received (Table G-3). Three of the letters included comments that were in support of the Project. One letter contained 6 substantive comments that have been addressed in the Final EA. One letter contained non-substantive comments, which are addressed in below.

Table G-3. Comment Letters and Comments Received.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Anonymous Citizen	Support for Project	I support and appreciate this proposed action. Best wishes for its approval and successful implementation.	Thank you for your support of the project.
Randall Porter	Support for Project	Thank you for this opportunity to comment. I am a retired BLM employee and have full confidence in the judgement of BLM specialists. Keep up the good work. This Environmental Assessment appears to be good in all respects except one: there is no such thing as a "draft" environmental assessment. NEPA provides for draft environmental impact statements, but has no provision for draft categorical exclusions or draft environmental assessments. This document is either a real EA or it isn't: there is no in between status. I realize that you will (doubtless) remove the 'draft' label when the manager signs his/her FONSI and Decision. I support your care for the river. I only wish you to ponder the role of NEPA in light of the recent cancellation of regulations 40 CFR 1500-1508. Traditionally, the act of commenting on a Decision makes the commentor an Affected Interest and grants the right (when needed) to file an appeal to the Interior Board of Land Appeals under 43 CFR 4. This is a critical point of Public Land management. This relationship to IBLA is precisely what makes BLM different from the U.S. Forest Service and Park Service. It is the reason why BLM is so responsive to the public and so expert at juggling the laws that govern public natural resources. That accountability is what keeps you sharp and good at your job. But comments to a 'Draft' do not create the same effect. ?If I felt the Trinity River Plan was all wrong, would commenting on a 'Draft' grant me status to file an IBLA appeal? Probably not. So you need to be conscious of putting Decisions on Eplanning, else you deny the Public its opportunity to participate in Public Land Management.	Thank you for your support of the project. We appreciate your input on the NEPA process. While BLM and Reclamation are not required to issue a Public EA and have a comment period, the USFS agency guidance requires this for certain projects. TRRP and its partners have solicted public input in various ways over the last 20 years, including holding regular open houses and meetings that are open to the public; and using public scoping and comment periods during the NEPA process. While not required by the Department of Interior, the TRRP has continued this in order to have transparency and stakeholder input on restoration work in the watershed.
Robert Laskodi	Support for Project	I totally support the activities described within Section 4.2 of the above referenced EA. I do NOT support Section 4.1, the No Action Alternative. While I am totally supportive of all activities as described in Section 4.2, I am especially supportive of the activities described in Section 4.2.1.5 -Salmon Carcass Placement and Section 4.2.1.6 RSI Supplementation.	Thank you for your support of the project.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Sandra Perez, Yurok Tribe Fisheries Department	Fisheries Resources	Upper Klamath Trinity River spring-run chinook: CDFW's listing petition page Petitions to List Species Under the California Endangered Species Act indicates that the UKTR spring-run chinook are listed as threatened. Note that the this draft Watershed Restoration EA (as well as recent EAs such as the Upper Conner Ck/Sawmill EA) incorrectly says they are state listed as endangered. I would recommend stab/consultants take a closer look at other listing statuses just to verify accuracy. This error appears in multiple places in the document including the main body, Appendix K, Table 3-1, etc.	This has been addressed and corrected in the Final EA and in Appendix J – Fisheries Technical Report. Thank you for bringing this to our attention.
Sandra Perez, Yurok Tribe Fisheries Department	Regional Effects	There was no mention of water diversions, aside from that associated with cannabis farming, as an impact. Water diversion was a strain on fishery and other resources even prior to the rapid growth of cannabis farming. Residential development is mentioned in its own section, but doesn't have nearly as large and direct impact as the diversions in some areas.	The Final EA now includes effects of water diversions from residential development in project activity descriptions and all appendices. Thank you for bringing this to our attention.
Sandra Perez, Yurok Tribe Fisheries Department	County Regulations for Herbicide Use	Trinity County herbicide ordinance was rescinded; but there is no mention of that. Recommend that when the adoption is mentioned, the rescission should also be referenced.	References to the County ordinance have been removed from the Final EA.
Sandra Perez, Yurok Tribe Fisheries Department	Road Decommissioning, Maintenance, and Rehabilitation Activity Description	Section 4.2.3.2 add "critical dips" to rolling dips as they are technically different (former is when the dip is placed at a stream crossing and are designed to help avoid stream diversions down the road in the event the stream overtops the crossing structure).	Critical dips have been added to the project activity description for Road Decommissioning, Maintenance, and Rehabilitation in Section 4.2.3 of the Final EA and Appendix H – Activity Cards.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
Sandra Perez, Yurok Tribe Fisheries Department	In-channel construction work window	Section 4.2.5.1., Construction Timing: Currently October 15 of each year is referenced as the end of the acceptable construction window, except for intermittent streams. The reality, particularly in the more frequent drought conditions that we've been experiencing, is that sometimes rains sufficient to create favorable salmonid migration conditions don't come by mid-Oct. The difference between instream conditions at a specific project site on Oct 1st versus Oct 20th in the same year can sometimes be indiscernible. Those extra days can make a huge difference. Further, in the last 15 years or so, there have been many years where extremely dry summer conditions result in critically high fire risk, which creates a reluctance to do certain types of heavy equipment work for fear of starting a fire in forested or grassy Restoration project locations. In late fall, cooler temperatures and low water instream conditions often make for ideal construction windows. It would be helpful to revise the language to allow for those scenarios where conditions warrant working past Oct 15. Work within a stream zone already has numerous required protocols including fish screening and best management practices (BMPs). Upslope work has several BMPs to protect water quality. Project proponents already coordinate with regulatory agencies closely throughout project implementation. Therefore, any concerns about weather or instream conditions in the latter half of October can be addressed with appropriate oversight. These regulatory agencies have biologists on stab that regularly observe conditions and should be well prepared to discuss and evaluate concerns with pursuing instream work past Oct 15, even in perennial streams.	Thank you for your comment. We understand that the in-channel construction time limitations can often pose a logistical issue; however October 15 close of the construction window is stipulated in the 2020 BiOp, which provides the Endangered Species Act (ESA) Section 7 coverage for instream habitat restoration activities in the EA. Under the NEPA process, Reclamation and its partners do not have the ability to alter what is authorized under ESA Section 7 consultation with NMFS and/or the USFWS. Further, site-specific project activities that would be completed under the EA are subject to all conditions outlined in the applicable biological opinions, which are the 2020 BiOp for ESA listed fish and aquatic resources, and the 2025 Statewide BiOp for USFWS manages endangered species.
Sandra Perez, Yurok Tribe Fisheries Department	Water Conservation Activity Description	Appendix H, page 4: Water Conservation Projects activity card, Monitoring Metrics: some of these projects are true conservation projects where participants reduce their overall water consumption. However, there are other project types – such as forbearance projects where strictly speaking, it's not saving much water over the course of any given water year, but rather isolating withdrawals to a wetter period. Suggest adding "or volume of water diverted during the wet season instead of during the low flow period" or similar language to the Monitoring Metric.	Thank you for bringing this to our attention. The Water Conservation Project Activity Card has been updated to include the volume of water diverted during the wet season instead of the low-flow season as a Monitoring Metric.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
John Vorpahl	Habitat restoration activity effects to fish species	(See full comment with figure graphics below) 4.2.1.1 Restoration and Enhancement of In-Channel Habitat 4.2.1.2 Floodplain Restoration These sections of the EA propose using off-channel habitats to benefit the growth of juvenile salmon. However, a recent study: "Assessing temperature regimes and juvenile Chinook Salmon growth in Trinity River off-channel and mainstem habitats". [Cooper et al. 2022], identified a significant impact on the growth and development of juvenile salmon reared in Trinity River off-channel habitats. **The Study** This study examined the growth of juvenile salmon in selected off-channel habitats and adjacent mainstem sites. Enclosures were established at six paired locations along the Trinity River- three upriver near Lewiston and three downriver near Junction City. In early May, Week of Year (WOY) 18, the enclosures were stocked with 60 hatchery juvenile salmon, and the fish were monitored until mid-June (WOY 24). **Figure 1.**Hertel et al pg 18 Sampling dates for off-channel and mainstem enclosures to measure fish length and weight from May 4 to June 16, 2020. [see figure graphic in letter below] **Results** **Figure 2** Hertel et al pg 23 Box plots of individual length (mm) measurements taken during each site visit, with sample sizes (n=). [see figure graphic in letter below] Certain sites experienced significant fish loss, and data from sites with fewer than 20 surviving fish at the last visit were excluded from the analysis. Seven of 12 sites remained: four off-channel (OC) sites, 2 upriver and 2 downriver; three mainstem (MS) sites, 1 upriver and 2 downriver. One downstream, off-channel site (SW3) had 47 surviving juveniles. The data that remain are consistent, credible, and conclusive.	Thank you for your careful review with the Cooper et al. 2022 paper, and for your engagement with the resources on TRRP's data portal (trrp.net/library/). The full document is available at this link: https://www.trrp.net/library/document/?id=2567. Cooper et al. 2022 note that "insufficiently sealed enclosures allowed fish to escape some experimental enclosures, compromising our study design. The loss of data at several sites did not allow for a formal analysis, resulting in a presentation of results as largely descriptive and qualitative. We recommend this study be repeated in a wetter water year to provide contrast to the findings presented herein, particularly with respect to the unexpected lower growth in thermally optimal conditions in off-channel features." While the results of the TRRP-funded study are made available, it is with the disclaimer caveat that the study was compromised by several factors and that the results are qualitative and descriptive in the absence of a formal analysis. The discussion and recommendations outlined at the end of the paper expand upon these factors. The overall conclusion of the paper supports that fish growth benefits from warmer temperatures, as greater growth was observed at warmer mainstem sites over cooler upstream mainstem sites.

Commenter(s) and/or Organization	Comment Topic	Specific Comment or Question	Response
John Vorpahl (cont.)	continued	2020 Mainstem (MS) and Off-channel (OC) **Analysis** **Figure 3** Compares growth of juvenile salmon at the Pear Tree trap site (rm=72) from 2009 to 2016 and 2020 with growth of mainstem (MS) and off-channel (OC) sites in 2020. [see figure graphic in letter below] Study Data were collected from 7 of 12 sites analyzed: 2 off-channel sites upriver and 2 downriver, along with 1 mainstem site upriver and 2 downriver. At Week of Year (WOY) 18, mean fork lengths of hatchery fish stocked in the enclosures were 62/63 mm. The size of juveniles at the beginning of the study and WOY suggest that parr (measure around 55 mm) have begun their transition into smolts (which generally measure 75 mm). Pear Tree Juvenile Salmon Growth (2009-2016) Mean weekly fork length of juvenile salmon migrating past Pear Tree (rm=73) from 2009 through 2016. At WOY 18, the mean fork length (FL) of juvenile salmon was 57 mm. A rapid increase in mean fork length was observed as juveniles grew during the study and transitioned from parr (typically 55 mm) to smolt-sized individuals (approximately 75 mm) by WOY 23. 2020 Pear Tree Juvenile Growth Sampling at Pear Tree in 2020 was halted and resumed at WOY 21. The limited data collected is consistent with the average data from previous years. Mainstem (MS) Sites Data were analyzed from three sites: one upriver and two downriver. Following the stocking at WOY 18, by WOY 22, mean fork length had increased at all sites, and at WOY 24 were 67, 68, and 70 mm. The growth rates observed were less than the average growth recorded at Pear Tree. Off-channel (OC) Sites Data were analyzed from four sites: two upriver and two downriver. Throughout the study, no significant growth of juvenile salmon was observed at any off-channel site. The initial mean fork lengths measured between 62 and 63 mm, while the mean fork lengths at the final visit varied from 62 mm to 64 mm.	(continued from above) This is consistent with the broader body of research on habitat restoration and juvenile salmonid growth. See the conclusion and the discussion sections of the paper for an in-depth discussion of the study limitations and recommendations for analyzing and improving conditions for juvenile salmon habitat.

3.3 Public Comment Letters

Below are copies of each of the comment letters receive in their original format. Comments have been copied in Table G-3 in their entirety except where noted.

ePLANNING

Comment Submission

Project: DOI-BLM-CA-N060-2025-0010-EA - Trinity River Watershed Restoration Project

Document: Trinity-Watershed-EA_Public-Draft-508.pdf

Submission ID: TRRPWatershedEA-1-500752166

Comment

I support and appreciate this proposed action. Best wishes for its approval and successful implementation.

Submitter(s)

Submitter 1

Name: Citizen
Address: Not Provided
Group or Organization Name: Not Provided

Disclaimer

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment - including your personal identifying information - may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Withhold my personally identifying information from future publications on this project) - ***NO***

ePLANNING

Comment Submission

Project: DOI-BLM-CA-N060-2025-0010-EA - Trinity River Watershed Restoration Project

Document: Trinity-Watershed-EA_Public-Draft-508.pdf

Submission ID: TRRPWatershedEA-1-500751046

Comment

Dear Sir or Ma'am:
Thank you for this opportunity to comment. I am a retired BLM employee and have full confidence in the judgement of BLM specialists. Keep up the good work.

This Environmental Assessment appears to be good in all respects except one: there is no such thing as a "draft" environmental assessment. NEPA provides for draft environmental impact statements, but has no provision for draft categorical exclusions or draft environmental assessments. This document is either a real EA or it isn't: there is no in between status.

I realize that you will (doubtless) remove the 'draft' label when the manager signs his/her FONSI and Decision. I support your care for the river. I only wish you to ponder the role of NEPA in light of the recent cancellation of regulations 40 CFR 1500-1508.

Traditionally, the act of commenting on a Decision makes the commentor an Affected Interest and grants the right (when needed) to file an appeal to the Interior Board of Land Appeals under 43 CFR 4. This is a critical point of Public Land management. This relationship to IBLA is precisely what makes BLM different from the U.S. Forest Service and Park Service. It is the reason why BLM is so responsive to the public and so expert at juggling the laws that govern public natural resources. That accountability is what keeps you sharp and good at your job.

But comments to a 'Draft' do not create the same effect. ?If I felt the Trinity River Plan was all wrong, would commenting on a 'Draft' grant me status to file an IBLA appeal? Probably not. So you need to be conscious of putting Decisions on Eplanning, else you deny the Public its opportunity to participate in Public Land Management.

Good Luck!

https://www.federalregister.gov/documents/2025/02/25/2025-03014/removal-of-national-environmental-policy-act-implementing-regulations

Submitter(s)

Submitter 1

Name: Porter, Randall
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Group or Organization Name: Not Provided

Alvares, Lauren A

From: [redacted]
Sent: Thursday, April 3, 2025 12:22 PM
To: ROBERT LASKODI; info@trrp.net
Subject: RE: [EXTERNAL] Trinity River Watershed Restoration EA

Hi Robert,

Thank you for taking the time to review the EA and provide a comment. We greatly appreciate your support of the project! Your comment will be included in the final EA, and you will be notified when the EA has been finalized.

Cheers,

Lauren Alvares
Natural Resources Specialist
Trinity River Restoration Program
Bureau of Reclamation

From: ROBERT LASKODI [redacted]
Sent: Thursday, April 3, 2025 11:43 AM
To: info@trrp.net
Subject: [EXTERNAL] Trinity River Watershed Restoration EA

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I totally support the activities described within Section 4.2 of the above referenced EA. I do NOT support Section 4.1, the No Action Alternative. While I am totally supportive of all activities as described in Section 4.2, I am especially supportive of the activities described in Section 4.2.1.5 - Salmon Carcass Placement and Section 4.2.1.6 RSI Supplementation.
Thank You,
Robert Laskodi
[redacted]

Hello TRRP staff,

Please accept these comments on the draft EA. I was not able to fully review the document, but am providing comments on aspects that I happened to notice while I was preparing a different project EA.

- Upper Klamath Trinity River spring-run chinook:
  CDFW's listing petition page Petitions to List Species Under the California Endangered Species Act indicates that the UKTR spring-run chinook are listed as threatened. Note that the this draft Watershed Restoration EA (as well as recent EAs such as the Upper Conner Ck/Sawmill EA) incorrectly says they are state listed as endangered. I would recommend staff/consultants take a closer look at other listing statuses just to verify accuracy. This error appears in multiple places in the document including the main body, Appendix K, Table 3-1, etc.

- There was no mention of water diversions, aside from that associated with cannabis farming, as an impact. Water diversion was a strain on fishery and other resources even prior to the rapid growth of cannabis farming. Residential development is mentioned in its own section, but doesn't have nearly as large and direct impact as the diversions in some areas.

- Trinity County herbicide ordinance was rescinded; but there is no mention of that. Recommend that when the adoption is mentioned, the rescission should also be referenced.

There are a few comments that were originally made in December 2023, some of which may not have been fully addressed:

- Section 4.2.3.2 add "critical dips" to rolling dips as they are technically different (former is when the dip is placed at a stream crossing and are designed to help avoid stream diversions down the road in the event the stream overtops the crossing structure).

- Section 4.2.5.1., Construction Timing: Currently October 15 of each year is referenced as the end of the acceptable construction window, except for intermittent streams. The reality, particularly in the more frequent drought conditions that we've been experiencing, is that sometimes rains sufficient to create favorable salmonid migration conditions don't come by mid-Oct. The difference between instream conditions at a specific project site on Oct 1st versus Oct 20th in the same year can sometimes be indiscernible. Those extra days can make a huge difference. Further, in the last 15 years or so, there have been many years where extremely dry summer conditions result in critically high fire risk, which creates a reluctance to do certain types of heavy equipment work for fear of starting a fire in forested or grassy restoration project locations. In late fall, cooler temperatures and low water instream conditions often make for ideal construction windows. It would be helpful to revise the language to allow for those scenarios where conditions warrant working past Oct 15. Work within a stream zone already has numerous required protocols including fish screening and best management practices (BMPs). Upslope work has several BMPs to protect water quality. Project proponents already coordinate with regulatory agencies closely throughout project implementation. Therefore, any concerns about weather or instream conditions in the latter

half of October can be addressed with appropriate oversight. These regulatory agencies have biologists on staff that regularly observe conditions and should be well prepared to discuss and evaluate concerns with pursuing instream work past Oct 15, even in perennial streams.

- Appendix H, page 4: Water Conservation Projects activity card, Monitoring Metrics: some of these projects are true conservation projects where participants reduce their overall water consumption. However, there are other project types – such as forbearance projects where strictly speaking, it's not saving much water over the course of any given water year, but rather isolating withdrawals to a wetter period. Suggest adding "or volume of water diverted during the wet season instead of during the low flow period" or similar language to the Monitoring Metric.

Please feel free to contact me with any questions. Thank you.

www.yuroktribe.org

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From: Abel, Kiana <jabel@usbr.gov>
Sent: Tuesday, April 22, 2025 12:41 PM
To: Jvorp <[redacted]>
Cc: info@trrp.net <info@trrp.net>
Subject: Re: [EXTERNAL] Trinity River Watershed Restoration EA - Public Comment

jvorp@aol.com,

Thank you for taking the time to review the EA and provide a comment. Your comment will be included in the final EA, and you will be notified when the EA has been finalized.

Cheers,
Kiana

Kiana Abel
Public Affairs Specialist | Trinity River Restoration Program | U.S. Bureau of Reclamation
1313 S. Main St., Weaverville, CA 96093-1300 | 530-623-1804 (desk) | 530-739-9761 (cell) |
jabel@usbr.gov

From: Jvorp <[redacted]>

Sent: Tuesday, April 22, 2025 12:00 PM
To: Trrp Info <info@trrp.net>
Subject: [EXTERNAL] Trinity River Watershed Restoration EA - Public Comment

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4.2.1.1 Restoration and Enhancement of In-Channel Habitat
4.2.1.2 Floodplain Restoration
These sections of the EA propose using off-channel habitats to benefit the growth of juvenile salmon. However, a recent study:
"Assessing temperature regimes and juvenile Chinook Salmon growth in Trinity River off-channel and mainstem habitats". September 2022 Emily J. Cooper-Hertel1, Kenneth T. Lindke2, Taylor Daley3, Kyle DeJuilio1, Kyle Hopkins1 1. Yurok Tribe Fisheries Department, 190 Klamath Blvd, Klamath, California 95548; (530) 430-1350 2. California Department of Fish and Wildlife, 5341 Ericson Way, Arcata, CA 95521; (707) 822-4230 3. U.S. Fish and Wildlife Service, 1655 Heindon Rd., Arcata, CA 95521; (707) 825-5124

identified a significant impact on the growth and development of juvenile salmon reared in Trinity River off-channel habitats.

The Study

This study examined the growth of juvenile salmon in selected off-channel habitats and adjacent mainstem sites. Enclosures were established at six paired locations along the Trinity River- three upriver near Lewiston and three downriver near Junction City. In early May, Week of Year (WOY) 18, the enclosures were stocked with 60 hatchery juvenile salmon, and the fish were monitored until mid-June (WOY 24).

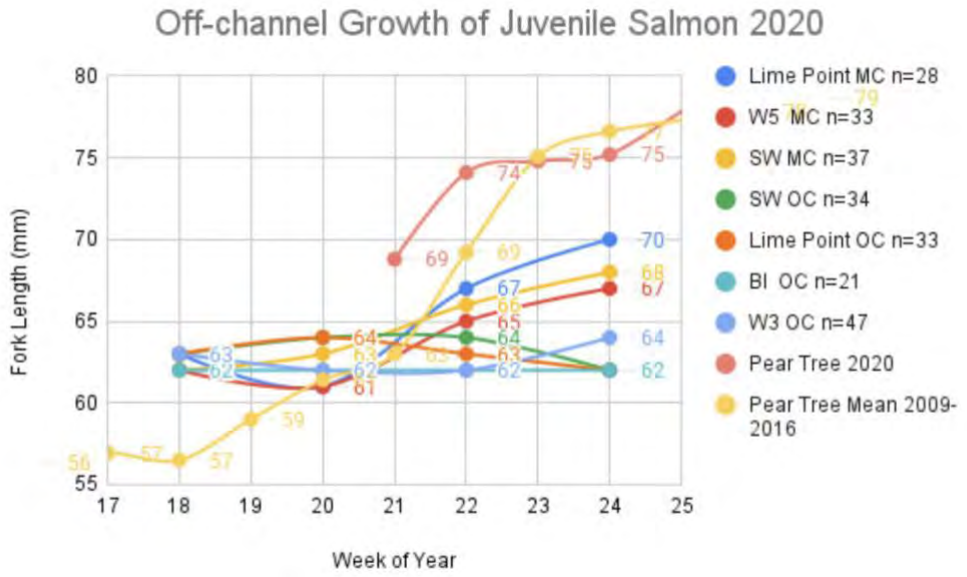
Figure 1. Hertel et al pg 18 Sampling dates for off-channel and mainstem enclosures to measure fish length and weight from May 4 to June 16, 2020.

Table 3. Sampling dates for off-channel and mainstem enclosures to measure fish length and weight from May 4 to June 16, 2020. All enclosures were sampled at each site during each visit except where indicated. Site codes are provided in parentheses.

Site Area	Site Name	Site Visit 1	Site Visit 2	Site Visit 3	Site Visit 4
Lewiston	Bear Island (BI)	5/4/2020	5/18/2020	6/1/2020	6/15/2020
Lewiston	Sawmill Macro (SM)	5/5/2020	5/19/2020	6/1/2020[a]	6/15/2020[a]
Lewiston	Sawmill SC (SW)	5/5/2020	5/19/2020	6/1/2020	6/15/2020
Junction City	Sheridan W5 (W5)	5/6/2020	5/20/2020	6/2/2020	6/16/2020
Junction City	Sheridan W3 (W3)	5/6/2020	5/19/2020	6/2/2020	6/16/2020
Junction City	Lime Point (LP)	5/7/2020	5/20/2020	6/3/2020	6/11/2020

[a] Off-channel enclosures were disassembled and excluded from the study starting on 1 June 2020 due to unsuitable conditions.

Results



2020 Mainstem (MS) and Off-channel (OC) Study
Data were collected from 7 of 12 sites analyzed: 2 off-channel sites upriver and 2 downriver, along with 1 mainstem site upriver and 2 downriver.
At Week of Year (WOY) 18, mean fork lengths of hatchery fish stocked in the enclosures were 62/63 mm. The size of juveniles at the beginning of the study and WOY suggest that parr (measure around 55 mm) have begun their transition into smolts (which generally measure 75 mm).

Pear Tree Juvenile Salmon Growth (2009-2016)
Mean weekly fork length of juvenile salmon migrating past Pear Tree (rm=73) from 2009 through 2016. At WOY 18, the mean fork length (FL) of juvenile salmon was 57 mm. A rapid increase in mean fork length was observed as juveniles grew during the study and transitioned from parr (typically 55 mm) to smolt-sized individuals (approximately 75 mm) by WOY 23.

2020 Pear Tree Juvenile Growth
Sampling at Pear Tree in 2020 was halted and resumed at WOY 21. The limited data collected is consistent with the average data from previous years.

Mainstem (MS) Sites
Data were analyzed from three sites: one upriver and two downriver. Following the stocking at WOY 18, by WOY 22, mean fork length had increased at all sites, and at WOY 24 were 67, 68, and 70 mm. The growth rates observed were less than the average growth recorded at Pear Tree.

Off-channel (OC) Sites

Data were analyzed from four sites: two upriver and two downriver. Throughout the study, no significant growth of juvenile salmon was observed at any off-channel site. The initial mean fork lengths measured between 62 and 63 mm, while the mean fork lengths at the final visit varied from 62 mm to 64 mm.