

**Trinity River Channel Rehabilitation Site:
Bucktail (River Mile 105.45-107.0)
Draft Environmental Assessment/Initial Study
DOI-BLM-CA-N060-2015-0057-EA and TR-EA0215**

November 2015

This document has been split into three parts to reduce the size of the document for distribution via the internet.

This is Part 2 of 3

A Table of Contents for the entire document is located at the beginning of the first part.

**Part 1: Document cover through Appendix A (cover to page A-30)
Part 2: Appendix B: Response to Comments part 1 (page B-1 to B-52)
Part 3: Appendix B: Response to Comments part 2 through
Appendix D (page B-53 to D-4, end of document)**

Appendix B

**Comments and Responses on the
Draft 2013 Bucktail and Lower Junction City EA/IS**

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Comment Summary

A total of 23 comment letters were received on the Draft EA/IS (see Table B-1) during the 30 day comment period between December 13, 2013 and January 13, 2014.

Seventeen of the 23 letters are related to relocating the boat/raft launch to the Bucktail Subdivision. All of the commenters who addressed the boat/raft launch relocation are opposed to this aspect of the project. They provide a variety of reasons in their comment letters. One commenter was concerned about work in the Junction City area; specific concerns are related to mining, cultural resources, and bald eagles. Two commenters expressed concerns about turbidity downstream of projects. Additional comment letters addressed the direction of the work on the Trinity River and stated support for small watershed projects. These commenters questioned the adequacy of the project's environmental documentation and requested that an EIS/EIR be completed.

All of the comment letters are reproduced on the following pages. Immediately following each of the comment letters are the responses to each of the sub-comments made in the letters. The exception to this is letters 1-17, related to the boat launch, which are addressed together in a single response after letter number 17.

Table B-1. Summary of Public Comments.				
Letter #	Commenter	Affiliation	Primary Concern(S)	Letter Date
1	June C. Black	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/22/2013
2	Bob and Sharon Brodnik	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/30/2013
3	Greg and Sandra Brodsky	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/30/2013
4	Ray and Kathy Burrows	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/31/2013
5	Kim Deasey	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/17/2013
6	Carlos and Corrine Gonzalez	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/19/2013
7	Andrew Jones	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/23/2013
8	Randy Jones	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/22/2013
9	Dave and Kathy Miller	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/20/2013
10	Karen Ream	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/22/2013
11	Kelly and Michael Stewart	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	12/27/2013
12	Robbin Sanchez	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/10/2014
13	Gary D'Arc	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/12/2014
14	Julie Welch-D'Arc	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/12/2014
15	Pam Yearout and Elizabeth Watson	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/12/2014

Table B-1. Summary of Public Comments.

Letter #	Commenter	Affiliation	Primary Concern(S)	Letter Date
16	Wayne Burditt	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/13/2014
17	Dorothy Moran	Landowner	Opposed to relocation of boat/raft launch to Bucktail Subdivision	01/05/2014
18	Bill Wright	Landowner Junction City	Concerned about work in the Junction City area (mining concerns, cultural concerns, bald eagles)	12/29/2013
19	Steve Townzen	Trinity River Guides Association (TRGA)	Opposes current project unless an EIS/EIR is completed. Recommend a focus on studying the efficacy of past projects while turning restoration efforts towards the watersheds.	01/03/2014
20	Herb Burton	Trinity Fly Shop owner, fishing guide	Concerned about the direction of the work on the Trinity River; should focus more work on tributary and small watershed projects.	1/5/2014
21	Clark Tuthill	Landowner	Concerned about turbidity downstream of projects.	01/06/2014
22	Bill West	Resident, Douglas City	Concerned about turbidity from past projects and sediment filling in fishing holes.	01/09/2014 Came attached with Letter #23
23	Coalition letter from multiple individuals and alliances	CWIN, TRGA, PCFFA, CSPA, SAFE, AquAlliance, EPIC, NEC, BEC, EWC, BEC, TLRA, FOER, and others as shown in submitted letter on page B-58	Environmental documentation is inadequate and an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) should be prepared. Impacts of mainstem projects have been greater than anticipated, but without promised benefits. Mitigation measures have not been adequate to reduce impacts to less than significant. The projects are larger in size, complexity, and impact than the ROD and 2000 EIS envisioned. Watershed and tributary restoration need consideration as an alternative in a new or supplemental EIS/EIR.	01/13/2014

Comment Letter 1



TRINITY RIVER RESTORATION PROGRAM Draft EA/IS Bucktail and Lower Junction City Comment Form

RELOCATION OF BOAT/RAFT LAUNCH TO BUCKTAIL SUB DIVISION

1. This will create a traffic/noise problem within this community. This is the only proposal I've seen that would create a launch area within close proximity of community housing.
2. Who will be responsible for the Trash and Debris as accumulates now in this area with no oversight by any agency besides the local residents. How will you monitor this problem as no agency has bothered to address this problem in the past!
3. Many homes within this area are vacations homes and are subject to break in, the only deterrent is the neighborhood watch. This move will open the chance of individuals to identify those homes that are acceptable for break-in due to the proximity in question and the lack of law enforcement oversight.
4. What agency holds the title of the property that is being considered for the relocation of this move?
5. The existing area where the boat/raft launch exists is known by the locals as Dirty Bird area, changes to the grading of this area may cause the creation of mosquito breeding ponds. Who will be responsible to monitor and correct these conditions when they occur?

I am an 89 1/2 year old widow and have owned my property since 1970. We moved up in 1974. The average age of the people who reside in Bucktail is around 60 to a lot of us (over)

Submitted by (please print)

Name JUNE C. BLACK Date 12-22-13

Address 51 Steelhead Circle

City/State/Zip Lewiston CA 96032 Phone 530-775-3967

Email/Contact None

walk around to pick up our mail
or just for exercises. We don't want
the traffic and we worry about
the mess and our property.

Your meeting notices in the
newspaper said you would talk
about the restoration of the
river from here to Douglas City
and beyond. You did not say
changing the boat ramp and
parking lot to the middle of
Bucktail Sub, would be on the
agenda.

I resent that the people in
Bucktail did not get notices
about it. Seems like you wanted
to sneak it in here. Why?

June C. Black

Comment Letter 2



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

WE STRONGLY OPPOSE TO MOVING
PUBLIC RESTROOM IN THE BUCKTAIL
DEVELOPMENT. THIS WILL CAUSE
ENORMOUS TRAFFIC AND PARKING
PROBLEMS (AND BOAT LAUNCH.)
THE FISHERMAN LEAVE GARBAGE AND
LITTER AS IT IS. THIS WILL COMPOUND
THE PROBLEM.

THANK YOU

Submitted by (please print)

Name BOB & SHARON BRODNIK Date 12/30/13
Address 4096 BROWN'S MTN RD
City/State/Zip LEWISTON, CA, 96052 Phone 415-320-0628
Email/Contact bobbrodnik @ COMCAST.NET.

Comment Letter 3



TRINITY RIVER RESTORATION PROGRAM Draft EA/IS Bucktail and Lower Junction City Comment Form

RELOCATION OF BOAT/RAFT LAUNCH TO BUCKTAIL SUB DIVISION

1. This will create a traffic/noise problem within this community. This is the only proposal I've seen that would create a launch area within close proximity of community housing.
2. Who will be responsible for the Trash and Debris as accumulates now in this area with no oversight by any agency besides the local residents. How will you monitor this problem as no agency has bothered to address this problem in the past!
3. Many homes within this area are vacations homes and are subject to break in, the only deterrent is the neighborhood watch. This move will open the chance of individuals to identify those homes that are acceptable for break-in due to the proximity in question and the lack of law enforcement oversight.
4. What agency holds the title of the property that is being considered for the relocation of this move?
5. The existing area where the boat/raft launch exists is known by the locals as Dirty Bird area, changes to the grading of this area may cause the creation of mosquito breeding ponds. Who will be responsible to monitor and correct these conditions when they occur?

Submitted by (please print)

Name GREG & SANDRA BRODSKY Date 12/30/2013
Address 7667 BROWNS MTN ROAD
City/State/Zip LEWISTON CA Phone 530 478 3783
Email/Contact beagle@williebird.com

Also 218 Florence Ave SEBASTOPOL CA 95472.

12-30-2013

To Whom it may concern.

We are writing to you vehemently oppose the relocation of the boat launch ramp and parking lot to Bucktail Sub division.

We own the front house on the river side facing east to Bucktail Hole. 20 years ago when we first seen this house/lot we loved the natural view facing east and proceeded to buy this house & property.

After all these years with a beautiful view towards Bucktail Hole & the adjacent B & M land we would hate to wake up to view ^{from the} noise of people & boats going into the river at 5 am and then coming and going all day.

Also, the value of our property would depreciate with this parking lot & boat ramp proposed to go in in front of our house.

Please, please do NOT put a boat ramp and parking lot in front of our house.

Greg & Sandra Bradsky

7667 Browns Mt Road
Leicester

767-829-0192

530-778-3783

Comment Letter 4

12/23/13

DEPARTMENT OF THE INTERIOR Mail - boat ramp in Bucktail subdivision



Gallagher, Michele <magallagher@usbr.gov>

boat ramp in Bucktail subdivision

Kathy Burrows <kathyrayburrows@yahoo.com>

Sat, Dec 21, 2013 at 2:07 PM

Reply-To: Kathy Burrows <kathyrayburrows@yahoo.com>

To: "magallagher@usbr.gov" <magallagher@usbr.gov>

Michelle:

We are one of many residents that oppose putting a boat ramp in our subdivision. There are many reasons why this would not be a good idea. There would be too much traffic. People would be parking everywhere, and leaving garbage. This could bring an element of people that may come back and burglarize our homes. We have worked hard to maintain a nice, clean, safe community and would hate to see it jeopardized.

I was also told that another reason for the ramp was because of fisherman snagging fish. This could easily be monitored by the fish & game. They could periodically go undercover and ticket the fisherman that are doing this.

The one resident that is in favor of this may hear the boats being put in the water but they are not seeing the parking lot, porta potty, dumpster or picnic table. It's on the other side of the river. The boat ramp should remain where it is currently as it effects the least amount of people.

Thank You,
Ray & Kathy Burrows (6500 Browns mt rd)

[https://mail.google.com/mail/u/0/?ui=2&ik=afa5975de2&view=pt&ost=EA other than NORTHWIND%20COMMENTS-Formal comments for EA Review&search=...](https://mail.google.com/mail/u/0/?ui=2&ik=afa5975de2&view=pt&ost=EA%20other%20than%20NORTHWIND%20COMMENTS-Formal%20comments%20for%20EA%20Review&search=...) 1/1

Comment Letter 5



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

RELOCATION OF BOAT/RAFT LAUNCH TO BUCKTAIL SUB DIVISION

1. This will create a traffic/noise problem within this community. This is the only proposal I've seen that would create a launch area within close proximity of community housing.
2. Who will be responsible for the Trash and Debris as accumulates now in this area with no oversight by any agency besides the local residents. How will you monitor this problem as no agency has bothered to address this problem in the past!
3. Many homes within this area are vacations homes and are subject to break in, the only deterrent is the neighborhood watch. This move will open the chance of individuals to identify those homes that are acceptable for break-in due to the proximity in question and the lack of law enforcement oversight.
4. What agency holds the title of the property that is being considered for the relocation of this move?
5. The existing area where the boat/raft launch exists is known by the locals as Dirty Bird area, changes to the grading of this area may cause the creation of mosquito breeding ponds. Who will be responsible to monitor and correct these conditions when they occur?

DREDGE DESPER AROUND THE ISLAND AREA

Submitted by (please print)

✓

Name K.M. DEASEY Date DEC 17, 2013

Address 180 STEELHEAD CIRCLE

City/State/Zip LEWISTON, CA, 96052 Phone 530-778-3934

Email/Contact MIKE081943@GMAIL.COM

Comment Letter 6



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

- 1- Added mosquito festation, within the neighborhood.
- 2- unwanted noise within the neighborhood.
- 3- unwanted traffic within the neighborhood. Kids at play.
- 4- unwanted trash who will clean that up? No
trash receptacles at existing boat launch.
- 5- Loitering, loud music, drinking added drugs.
- 6- Theft to the neighborhood homes and property.
- 7- Injury to kids, people and animals (pets) due to
activities at boat launch going on during the day.
- 8- Parking issues
- 9- waste of funds, keep the existing boat launch.
Keep the existing boat launch !!!

*(We Dont want BAF-2) STOP!!

STOP the plan!

Keep BAF-1 !!

Submitted by (please print)

Name Carlos & Corrine Gonzalez Date 12/19/13
Address 60 Steelhead Cir
City/State/Zip Lewiston, Ca 96052 Phone 530-778-3108
Email/Contact Corrine.Gonzalez1017 @ G mail

Comment Letter 7



TRINITY RIVER RESTORATION PROGRAM Draft EA/IS Bucktail and Lower Junction City Comment Form

No Boat Ramp

Bucktail is a residential community not a marina. we do not want a boat ramp, parking lot toilet or picnic table. we the residences walk their dogs, ride bikes around Browns Mt road, salmon to steelhead cir. we do not need the traffic noise or garbage.

Dirty Bird boats ramp wasn't built for launching boats or rafts. It is a natural drainage and the only reason a toilet, picnic table were put there was for the handicapped kids that come once a year to float the river. BLM installed a garbage can then took it out.

Dirty Bird, Rush Creek and Old Bridge require two or three vehicles for every boat. That's a lot of traffic we don't need. It's bad enough picking up all the garbage from the fishermen.

No Boat Ramp

Submitted by (please print)

Name Andrew L. Jones Date 12/23/13

Address 117 Steelhead Cir.

City/State/Zip Lewiston Co, 96052 Phone 778-3006

Email/Contact _____

Comment Letter 8



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

I disapprove of moving boat
ramps. Way too much traffic
in the neighborhood and children
live right across the street,
Very bad idea!

Submitted by (please print)

Name Randy Jones Date 12-22-13

Address 117 Steelhead Circle

City/State/Zip Lewiston CA 96052 Phone 778-3006

Email/Contact bucks and duck 61@yahoo.com

Comment Letter 9



TRINITY RIVER RESTORATION PROGRAM Draft EA/IS Bucktail and Lower Junction City Comment Form

- There would be several homes affected by a boat ramp/parking lot in the proposed area. Many of these homeowners bought their properties for the view of the river and its surrounds.
- There are a lot of older people in this subdivision that walk their dogs. Added traffic will impact the foot traffic in the area.
- Many homes are vacation homes and the introduction of traffic from out of the area will surely bring with it the possibility of theft and vandalism.
- The River Restoration was established to mitigate problems pertaining to the welfare of salmon and steelhead populations, not to build public boat ramps and parking lots.

Submitted by (please print)

Name DAVE & KATHY MILLER Date 12-20-13

Address 25 STEELHEAD CIRCLE

City/State/Zip 96052 Phone 778-0801

Email/Contact mountainkathy@sbglobal.net

Comment Letter 10



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

I would rather not have
the boat ramp moved directly
across the street from where I
live as a single mother to a 3
yr old and a 14 yr. old. Too much
extra traffic and strangers involved

Karen Ream

Submitted by (please print)

Name Karen Ream Date 12/22/14
Address 6831 Brown mtn Rd
City/State/Zip Lewiston Ca 96052 Phone (530) 739-9558
Email/Contact _____

Comment Letter 11



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

1. TRAFFIC IN AREA.
2. TRINITY ^{RIVER} RESTORATION PROGRAM IS TO RESTORE RIVER AND BANK AREA. NOT TO DESTROY.
3. POLLUTENCE OF WATER FROM EACH BOAT AND VEHICLE IN WATER.
4. LITTER AND GARBAGE ADDED TO AREA.
5. CRIME RATE WILL RISE.
6. CHILDREN IN AREA IN DANGER OF VEHICLES.
7. DESTRUCTION OF VIEW FROM MY HOME.
8. FISHERMAN AREA DESTROYED.
9. BATHROOM AREA STENCH IN SUMMER.
10. CHILDREN PROTECTION FROM BEING TAKEN
11. NOT NOTIFIED OF MEETING OR RECIEVED ANYTHING ABOUT WHAT WAS TO TAKE PLACE.
12. DESTRUCTION OF WILDLIFE HABITAT.
13. NOISE LEVEL WILL RISE.
14. SOME PARTY'S HAVE BEEN AT OTHER BOAT RAMPS. DON'T WANT IN OUR AREA.

Submitted by (please print)

Name KELLY STEWART/MICHAEL STEWART Date 12-27-2013

Address 61 SALMON DR

City/State/Zip LEWISTON, CA, 96052 Phone (530) 778-3570

Email/Contact _____



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

15. DRUGS IN AREA WILL INCREASE.
16. BOATS WAITING TO GET OUT OF WATER WILL ENCROACH IN TO FISHERMANS AREA.
17. PEOPLE'S PETS IN DANGER OF TRAFFIC.
18. POSSIBLE FIRE HAZARD. DUE TO OTHER BOAT RAMPS IN AREA PEOPLE HAVE MADE FIRE PITTS THAT ARE NOT LEGAL.
19. ~~LEAK~~ VEHICLES MAKING NOISE AT 6 A.M. WHILE PEOPLE ARE SLEEPING.
20. PEOPLE PARKING ON PRIVATE PROPERTY. NOT RESIDENT OF PROPERTY.
21. PROPERTY OWNED BY WATER COMPANY IN BUCKTAIL SUBDIVISION. WHICH I AM A MEMBER AND DON'T AUTHORISE POSSIBLE SALE OF LAND.

Submitted by (please print)

Name KELLY STEWART / MICHAEL STEWART Date 12-27-2013

Address 61 SALMON DR.

City/State/Zip LEWISTON, CA, 96052 Phone (530) 778-3570

Email/Contact _____

Comment Letter 12

1/13/14

DEPARTMENT OF THE INTERIOR Mail - Response to Bucktail and Lower Junction City Proposed 2014 Chanel Rehab Sites



Gallagher, Michele <magallagher@usbr.gov>

Response to Bucktail and Lower Junction City Proposed 2014 Chanel Rehab Sites

1 message

Robbin Sanchez <robbin.sanchez@swgas.com>
To: "magallagher@usbr.gov" <magallagher@usbr.gov>

Fri, Jan 10, 2014 at 5:12 PM

Hello Michele,

We met at Thanksgiving week when I was in Lewiston. I am a property owner in Bucktail Subdivision at 21 Salmon Drive.

I am opposed to the construction of another boat launch facility within the Bucktail Subdivision area. There is already a really nice boat launch area at Dirty Bird, just downstream of Bucktail Bridge and the subdivision. I am more concerned though with the increased traffic into the subdivision as well as more people coming and going at all times on Brown's Mountain Road and through the subdivision. There is also potential for more trash being left around, look how messy it gets at Bucktail Hole currently, that would just be extended down into the subdivision and proposed launch area.

I think it's a waste of money to build a second launch so close to the existing as well as I really don't want the extra traffic coming through the subdivision. I would also like to maintain the low level of traffic currently on our streets.

If you need any additional information, please email me or you can call me on my mobile at 702-523-0368.

Thank you for listening to my concerns,

Robbin Sanchez

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Comment Letter 13

1/13/14

DEPARTMENT OF THE INTERIOR Mail - Moving of River access



Gallagher, Michele <magallagher@usbr.gov>

Moving of River access

1 message

Gary Darc <garyjidarc@gmail.com>
To: magallagher@usbr.gov

Sun, Jan 12, 2014 at 3:57 PM

January 12 2014

Dear TRRP,

It was nice to talk to your representative about the proposed project in the Bucktail community. She was very polite and was willing to hear our concerns. When I retired, I was in search of a pristine, crime free community with good neighbors who keep an eye on each others properties. Since moving here I have slowly become more involved with the community issues. Today, I am the president of the Bucktail Water Company. I stated my concerns to your representative (Michelle Gallagher) and she advised that I draft this letter.

First of all there is a strip of land running next to the road leading down to the river which belongs to the Bucktail Water company.

Secondly, the proposed project will be an intrusion to our community, which is supposed to be a preserve for fly fishermen not boats.

Thirdly, we have tolerated the launch area, that you installed, in the current location, which can be improved without wasting money already spent. Keeping the public on the other side of the river from us is now our first priority since many of the cabins here are now starting to get broken into. In addition, I can tell you from my daily walks that the trash is not getting picked up in the already established area. Also seen are illegal fires from campers that are looking for places to camp where there is no fee. They stay on after fishing and party, throwing bottles and breaking glass! These people have no respect for our community and see the launch areas as an opportunity to full fill their "wilderness" desires. Some are locals, fishermen guilds, yes,,,but the late night homeless always use the areas to dump their trash and do their drugs.

Please, I beg you,,,,,not to go forward with this boat launch project. It will only put more stress on poor Sheriff Haney, who is already understaffed and under paid. It will bring forward litigation and put more money in the hands of the greedy lawyers.

As far as I know, there is only one resident here that is for the project, only because it moves the commotion down the river from their home/business. I assure you, that they do not represent anybody but their own greedy intentions. They are a constant irritant to this community and are constantly testing our laws and agreements. They were the ones who tried to sneak this idea in under the noses of the rest of the community. As you are finding out by now this will not go over well with anyone else living here.

Please excuse me, my glasses have just started steaming up!

Thank you, for providing a forum for us to speak to. I only hope our response will make a difference?
If there are any questions about who's who, or what's where. Don't hesitate to call !

Gary d'Arc
6625 Browns Mountain Road
778-3561

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1/1

Comment Letter 14

January 12, 2014

To whom it may concern:

This letter is in regards to the proposed new boat ramp/parking lot in the Bucktail Subdivision. I understand this project is a part of a plan that the TRRP has put forward in conjunction with the BLM.

Myself and my husband own two properties in the Bucktail Subdivision. As homeowners and residents who have planned to retire here, I will speak for myself. I am very much against the planned "parking" for many reasons. They will be listed here as follows:

The current boat ramp on the other side of the river is adequate and well equipped for parking and the needs required for parking including the current mason block toilets and trash bins set up for bear proofing. Use there is non-impactful to all the residents of the Bucktail Subdivision. As it is, trash bins in the current usage area are continually neglected by "whoever" is required to dispose of it. If the parking area was to move, there is a certainty the trash problem will only become worse than that which already exists. As it is, most residents who live here full time take efforts to offer private trash cans and trash bags hanging on trees as most non-residents are quite disrespectful when it comes to hauling out their own trash. I have one photo of my husband with a days haul of trash he collected, everything from cigarette packages and butts, beer cans, dirty diapers, fast food wrappers, styrene containers and even discarded oil cans and fish guts. Those of us who live in this subdivision respect the right of non-residents to fish here but in no way appreciate the trash and wear and tear on this portion of the river that random visitors bring with them. At least, while the trash picks up on the other side of the river, we can't see it.

I understand that one householder in this subdivision has claimed that the noise from the current boat ramp affects them to the point their suggestion has caused this new proposal. As a homeowner with a river front property myself, boats and fishermen often dock in one of the "better" holes right in front of my property, in that portion of the river just a short walk from the proposed parking lot. I hear fishermen banter and clanking of boats all the time. It is a given for that part of the river. I expect to hear the voices of those utilizing the river, often children walking on the banks with parents, and a splash or too from those who might be playing fetch with their dogs. Recreational visitors are a given. The idea of a proposed new parking lot will open up a noise level inappropriate for an already fairly pristine portion of the river there. The existing boat ramp is isolated and non-problematic for the over 30 residential homes in this subdivision. One householder can not create a problem for the entire subdivision to this degree. Since the householder bought their property after the existing boat ramp was established, it is ludicrous that they would like to change things now. Notwithstanding, rafting and kayaking is one of their businesses.....having a larger parking lot seems to further their interests only.

The high water mark shows that when the river is flooded, that would put the proposed parking lot underwater for periods of time. While the existing boat ramp/parking lot often meets with high water, toilets and trash bins are NOT impacted. The dirt and gravel parking area is easily restored and repaired from season to season during river flooding. I can not see monies spent on a poorly placed public access when the existing area is so easily maintained. It is been reported that the porta potty once placed near the existing bridge as a toilet for public use was knocked over DURING high water and was the responsibility of the BLM. This causes me no faith in their property oversight and responsibility. As it is, residents would like to see the Porta Potty removed from the river there.

The Bucktail fishing access has had a reputation for being able to catch fish here. The infamous Bucktail Hole as it is called is directly across from the proposed parking lot. The logic of disturbing that portion of the river just in front of what has been known as one of better holes to catch a fish, is not logic, it is stupidity. If there were a fish to be caught on this portion of the river, destroying the hole with excavation, plant disturbance, soil and silt infiltration of the river is against any thinking of river improvement and developing fish habitat. This makes no sense.

As the secretary to the Bucktail Mutual Water Company, property adjoining the proposed parking, is owned by the Company. All shareholders in this water company have agreed that the property there remain intact. Implications of intrusion upon the property with public access developed right next door is a given. There are multiple private properties adjoining the proposed area. Greater public access in a private neighborhood is a truly bad idea.

Do not proceed with your plan for public access in a private subdivision.

Respectfully yours,

Julie Welch-D'Arc

6625 Browns Mountain Road

Lewiston, CA 96052

530-778-3561

Comment Letter 15

1/13/14

DEPARTMENT OF THE INTERIOR Mail - proposed boat ramp in the Bucktail Subdivision



Gallagher, Michele <magallagher@usbr.gov>

proposed boat ramp in the Bucktail Subdivision

1 message

Elizabeth Watson <elizabethwatson75@gmail.com>
To: magallagher@usbr.gov

Sun, Jan 12, 2014 at 8:39 PM

Pam Yearout and I, Elizabeth Watson, live in the Bucktail Subdivision in Lewiston, Ca. We understand there is a proposal to build a boat ramp and restrooms on the land behind our mailboxes near the junction of Brown's Mntn road and Salmon, in our subdivision. We are against this proposal. This is a residential neighborhood, with mostly full time residents at this time. We have animals, we have children, we are entitled to our relative quiet and peace of mind in our neighborhood. This proposed boat ramp and restrooms will bring far too much traffic, in terms of people and of vehicles, which would negatively impact our residential neighborhood. We urge the denial of the proposal to build this boat ramp and restrooms in our neighborhood. Sincerely, Elizabeth Watson and Pamela Yearout, 175 Steelhead Circle, Lewiston, Ca 96052. Telephone # 530-778-3135.

Thank you for your consideration.

Comment Letter 16

1/13/14

DEPARTMENT OF THE INTERIOR Mail - Objection to proposed launch ramp and parking lot Lewiston



Gallagher, Michele <magallagher@usbr.gov>

Objection to proposed launch ramp and parking lot Lewiston

1 message

Wayne58994@aol.com <Wayne58994@aol.com>

Mon, Jan 13, 2014 at 3:06 PM

To: magallagher@usbr.gov

Good afternoon, Michelle;

It has recently come to my attention that there is a proposal to build a parking lot and or launch ramp off of Brown's Mtn. Road, in Lewiston.

I am the owner of two houses there, one which is directly across the street from the proposed project (6831 Brown's Mtn Rd) and the other which is 3 doors south (10 Steelhead Circle).

Please let the record show that I am very strongly opposed to any construction of a launch ramp and or parking lot in that location. I have invested a great deal of money in these two pieces of real estate with the understanding that nothing would ever be built between those properties and the river.

I object to the traffic, the noise, the damage to the river, the damage to the public access fishing hole in that immediate area and the potential for increased crime that would be brought to our area. I also object to the mess and trash that would potentially be left in our area. Additionally, the early morning traffic and noise that is caused by the pre-dawn fishermen launching their aluminum drift boats at these boat launches would be totally unacceptable to us.

I simply cannot understand why the existing parking lot and launch ramp, not a quarter of a mile away isn't sufficient to serve the public's needs in that area. I do not want to disrupt the quiet and peaceful neighborhood that we have in the Bucktail subdivision and that we have all come to enjoy, after spending a great deal of money to buy the real estate in that subdivision. My wife and I have plans to move into one of those homes for retirement and it would totally destroy our plans to have a parking lot and public launch ramp directly across the road and right out our front door.

Please let me know what I have to do to do my part to be sure that this does NOT happen.

I thank you for your time, for reading this and for understanding that this would be a major problem for me, both in terms of future plans and in terms of my financial position.

**Sincerely,
Wayne Burditt
Box 129
Douglas City, Ca 96024
(530) 623-1917 (760) 803-6130**

<https://mail.google.com/mail/u/0/?ui=2&ik=sfs5975de2&view=pt&search=inbox&th=1438ddb7f6dd17d5>

1/2

Comment Letter 17



TRINITY RIVER RESTORATION PROGRAM
Draft EA/IS Bucktail and
Lower Junction City Comment Form

I'm against the moving of the
bathroom and boat Launch over to
the Brown mtn Rd & Salmon Ave. location.

Submitted by (please print)

Name DORTHY MORAN Date 1/5/14

Address 141 Steelhead Cir

City/State/Zip Lewiston, Ca 96052 Phone 530-778-3560

Email/Contact _____



Response to Comment Letters 1-17

Response to Comment Letters 1 through 17 – Proposed boat launch relocation.

A total of seventeen comment letters were received on the proposal to relocate the existing public boat launch to an area just downstream of the Bucktail Bridge. All commentors objected to relocation of the boat launch, with its associated parking area and restroom facilities, citing potential impacts that could negatively affect the community. Their concerns included:

- Increased traffic volume, with associated dangers for children and pets,
- Increased noise/trash,
- Increased crime/vandalism,
- Loss of privacy, and
- Damage to the “Bucktail fishing hole” and surrounding habitat, located just downstream of the proposed boat ramp relocation, that would experience increased use with the new development.

The boat ramp relocation alternative was included in the Draft EA/IS as an option to convert the current boat area into a riparian planting area (see page 45, BAF-1, Boat Access Facility from the Draft EA/IS) to benefit local fish and wildlife species with a relatively large block of continuous riparian habitat. The Draft EA/IS review period afforded the opportunity to gauge community support for the development of an improved facility in the downstream location.

After reviewing the proposal and considering public input, BLM land managers of the area determined that relocation of the current Bucktail boat launch facility would no longer be considered.

Comment Letter 18

12/30/13

DEPARTMENT OF THE INTERIOR Mail - Comments on 2014 EA/IS



Gallagher, Michele <magallagher@usbr.gov>

Comments on 2014 EA/IS

1 message

Bill Wright <librarybike@hotmail.com>
To: magallagher@usbr.gov

Sun, Dec 29, 2013 at 11:54 PM

December 30, 2013
To Project Review Staff,

The Bureau of Reclamation has released for public review a Draft Environmental Assessment/Initial Study on the Trinity River 2014 Channel Rehabilitation Project sites Bucktail and Lower Junction City. Here are my written questions and comments on this document.

A. The location of your proposed project is in Junction City, where in 1852 Issac Cox reported there were " between 150 and 200 miners at work. In addition he reported 70 to 80 Chinese." (footnote 2). Your project seems to impact the Chinatown location of Junction City. What mitigation or other improvement do you propose?

A

B. Does the construction or work impact Bald Eagles in the area?
I tried many times to access this information at;
http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=15761

B

and received error messages that the sight was not available.

C. Does this project envision future public uses of the river from the shores?

C

D. Private landowners impacted include landowners from the townsite of Junction City. Do you understand the lands of the original townsite of Junction City were designated to be in the Trinity River?

D

E. Do you understand that, even if the river bed centerline was moved by mining operations the Junction City townsite parcels still extend into the location of the flow of the river?

E

F. In the areas of the Junction City Townsite, do you recognize , the lots within the Townsite (11,12,13,14,15,etc...)of Junction City predate the Benjamin and Keno mine claim patented land description?

F

G. I believe there is not intention for any conflict between the Benjamin and Keno mine claim land description and the Junction City Township land descriptions, as they both intended to keep there lines and corner descriptions in the river line. Do you agree?

G

H. A surveyor just makes marks where things are and does not determine ownership rights. Your project however affects issues of conservation easements rights, river and land rights; and should be more fully and appropriately investigated. Maybe title investigation and assurances should be performed. Do you agree?

H

Footnotes:

1. Trinity County Historic Sites book 1981, Page 152
2. Trinity County Historic Sites book 1981, Page 151

Bill W. Burton
P.O. Box 42
Junction City, CA 96048

<https://mail.google.com/mail/u/0/?ui=2&ik=sfa5975de2&view=pt&search=inbox&th=143427f620cc7a6c>

1/1

Response to Comment Letter 18

This letter contains 8 distinct comments (A-H). Following are the responses to those comments.

Comment 18.A – Work location is on Chinatown.

Cox (1852) did identify Chinese miners in the vicinity and was one of the primary reference materials used as part of the pre-field analysis of the project area (Mark Carper, Bureau of Reclamation Archaeologist, pers. communication, January 2014). Literature reviews and other pre-field research are used to pull as many resources together as possible for multiple reasons. These pre-field summaries help to identify the level of sensitivity that a project may evince in the presence of cultural resources. They also create a level of expectation for what could be found, should historic resources be located on site.

Field surveys at the Lower Junction City site failed to identify the presence of any physical evidence of Chinese mining and no evidence predating the 20th century was found within the project area. Extensive bucket-line dredging during the early 20th century and natural river events, including some of the historic floods, have removed any physical evidence of the earlier mining era at the site.

The Bucktail and Lower Junction City EA/IS, Cultural Resource section, 3.10, explains the requirements that the lead agencies must operate under to ensure that there are no significant impacts to cultural resources. From this section:

“The National Historic Preservation Act (NHPA) of 1966 is the primary Federal legislation that outlines the federal government’s responsibility related to cultural resources. Section 106 of the NHPA requires the federal government to take into consideration the effects of an undertaking on cultural resources listed on or eligible for inclusion in the National Register of Historic Places (NRHP). Those resources that are on or eligible for inclusion in the NRHP are referred to as historic properties.”

In order to ensure that no impacts to historic properties would occur during implementation of the Lower Junction City project, cultural resource surveys were conducted on the site in 2011, as documented in a report by AECOM, titled: “*Cultural Resources Inventory for the Upper and Lower Junction City Segments for Phase II of the Trinity River Restoration Program*”. Additionally, northern portions of the project area were inventoried in 2004, as documented in a report by the Bureau of Reclamation, titled: “*Cultural Resources Inventory for Hocker Flat Project Area*.” A copy of these reports can be viewed at the Trinity River Restoration Program office. Because no physical evidence was found within the project footprint, no further mitigation beyond the documented surveys is required.

Comment 18.B – Bald eagle impacts.

Construction at the Lower Junction City Project would not impact bald eagles. Prior to the start of construction, a qualified biologist would conduct a survey of the rehabilitation site to determine the presence of eagles or eagles’ nests. If eagles or an active nest are found within 500 feet of the construction area, the biologist, in consultation with the CDFW and the National Bald Eagle Management Guidelines, would determine the extent of a construction-free buffer zone to be established. Further, because the destruction or removal of an inactive eagles’ nest requires a federal permit, no trees with an inactive eagles’ nest would be removed.

Mitigation measures 4.7-8a, 4.7-8b, 4.7-8c, and 4.7-8d described in Appendix A of the Draft EA/IS (NCRWQCB et al. 2013b) would be implemented prior to project implementation in order to reduce the potential for impacts to bald eagles associated with the Proposed Project. Implementation of the specified mitigation measures, and adherence to protections under the Bald and Golden Eagle Protection Act, would reduce any impacts to less than significant.

Comment 18.C – Public use.

Properties where construction would take place within the Lower Junction City Project Environmental Study Limit are all privately owned (Refer to Figure 3 in the Draft EA/IS). Ownership of these parcels

and public use of the river from their boundaries would continue to be dictated by the landowners post project just as it is prior to construction.

Comment 18.D – Junction City ownership.

The TRRP has completed a boundary survey in the project area and a preliminary Record of Survey has been submitted to the County Recorder's office. The Trinity River Restoration Program (Program) utilizes Record of Survey maps approved and filed by the County Surveyor and recorded by the Trinity County Recorder's Office, as well as those surveys conducted by the United States Bureau of Land Management (BLM), in the design and implementation of channel rehabilitation projects.

Determinations regarding the interpretation of original surveys are outside the scope of this EA/IS. The Program cannot adjudicate property boundary disputes or challenges to the historical record. Such conflicts may be resolved as civil matters before judicial courts.

Comment 18.E – Townsite parcel extent.

The Program uses the services of a licensed land surveyor who is bound by the requirements of the Professional Land Surveyors' Act, (Business and Professions Code §§ 8700-8805, effective January 1, 2014) for privately-owned lands. Public land surveys are conducted by BLM professional surveyors. The BLM, formerly known as the General Land Office, maintains the official Land Status and Cadastral Survey records database, comprised of Master Title Plats, Historical Index pages, Cadastral Plats and survey notes, with current and historical information on mining claims, land patents, grants, leases, withdrawals, and more.

Only professional and licensed land surveyors are qualified to: "Locate, relocate, establish, reestablish, or retrace any property line or boundary of any parcel of land, right-of-way, easement, or alignment of those lines or boundaries." (Professional Land Surveyors' Act of the Business and Professions Code defines land surveying in Section 8726, paragraph (c). And further in paragraph (e): "By the use of the principles of land surveying determines the position for any monument or reference point which marks a property line, boundary, or corner, or sets, resets, or replaces any such monument or reference point."

Comment 18.F – Historical designations.

Determinations regarding historical designations or interpretations of original surveys are outside the authority of the lead agencies and the scope of this EA/IS. The Program cannot adjudicate property boundary disputes or challenges to the historical record. The Program uses the services of a licensed land surveyor who is bound by the requirements of the Professional Land Surveyors' Act for all survey actions.

Comment 18.G – Historical mine claim and land descriptions.

Refer to response to comment 18.F.

Comment 18.H – Project ownership.

The TRRP will do no work on private lands without a signed landowner contract that describes the work to be done on the landowner's property and compensation for temporary use of their lands. Title reports, upon which TRRP contracts are based, are obtained through an independent title company that utilizes the property records of Trinity County to assure any deeds and easements before project commencement. These temporary contracts do not encumber property deeds or affect long-term river or land rights. Consequently, the project would have no effect on land ownership in the area.

Comment Letter 19

PO Box 327 Douglas City, CA 96024



www.trinityriverguidesassociation.com

1/3/2014

Robin Shrock, Executive Director
Trinity River Restoration Project
P.O. Box 1300, 1313 South Main St
Weaverville, CA 96093



Subject: Comments on Trinity River Channel Rehabilitation Sites: Bucktail (River Mile 105.3-106.35) and Lower Junction City (River Mile 78.8-79.8). Draft Environmental Assessment/Initial Study. DOI-BLM CA-N060-2014-014-EA and TR-EA0114.

Dear Ms. Shrock,

The Trinity River Guides Association (TRGA) represents the fishing guides and greater sportfishing community who recreate annually on the Trinity River. Our members collectively spend thousands of days each year on the river, and have an intimate relationship with every rock, riffle, and pool on the river.

We initially got involved in the Trinity River Restoration Program (TRRP) in 2011, when we began to realize that the projects were appearing to impact the river negatively. We've encouraged the TRRP to incorporate our expert river experience into their policy, and feel that the dialogue has helped to educate those individuals within the TRRP willing to listen and admit that on-the-water experience is as valuable, if not more-so, than computer generated modeling that consistently proves in-accurate at best. The TRGA strongly believes a more balanced approach to restoration – one that incorporates science and on-the-water anecdotal experience – will help shepherd a more successful restoration program on the Trinity River.

A

We have grave concerns over the direction of the Trinity River Restoration Program, specifically with regards to the proposed Lower Junction City and Bucktail Projects. Particularly, the Bucktail Project: this is one of the worst designs we've seen, and we feel the recommendations from the various stakeholder groups who have the most experience and local expertise on the river were not reflected within the proposed restoration design. If the Program is striving for inclusion, transparency, and adaptive management, these are unacceptable results. We staunchly disagree with almost every facet of the Bucktail Project, specifically the split flow and mechanical re-routing of the river. It should also be noted that the project designers admitted in a Dec. 3 meeting in Lewiston that for the project to work at all considerable work would need to be done on the Bucktail Bridge, yet this is not within the scope of the project and is not a project proposed for construction in the near future.

B

TRGA and other local stakeholders groups are frustrated regarding the trend of projects to shifting further away from the Record of Decision (ROD), which has prompted us to take a strong stance adamantly opposing any future projects on the mainstem Trinity River, until a full Environmental Impact Review (EIR) and Environmental Impact Statement (EIS) can be completed. The TRGA believes any future or proposed projects should more accurately reflect the scope of the existing Master Environmental Impact Statement (MEIS), and if projects move outside the MEIS, the Regional Water Quality Control Board should amend or revoke the existing permit with the lead agency, or require a new EIS to be completed for each project: --

C

In 2009, the Regional Water Board acted as lead agency for a Master Environmental Impact Report (MEIS) and site specific Environmental Assessment Impact Report (EA/EIR) (State Clearinghouse number 2008032110) for channel rehabilitation and sediment management activities for the remaining Phase 1 and Phase 2 sites in order to comply with the CEQA. The Regional Water Board certified the environmental documents on August 25, 2009 (WDID No. 1A09062WNTR). Under California Code of Regulations, title 14, section 15177. After a Master EIR has been prepared and certified, subsequent projects which the lead agency

determines as being within the scope of the Master EIR will be subject to only limited environmental review. The preparation of a new environmental document and new written findings will not be required if, based on a review of the initial study (IS) prepared for the subsequent project (e.g., the Bucktail and Lower Junction City EA/IS), the lead agency determines, on the basis of written findings, that no additional significant environmental effect will result from the proposal, no new additional mitigation measures or alternatives may be required, and that the project is within the scope of the Master EIR.

The TRGA board and membership met and reviewed the documentation and discussions from the December 17 TRRP Design Team meeting, and have come to a consensus agreement regarding TRGA's opinion and policy towards future TRRP projects on two specific points:

- 1) The Trinity River Mainstem Fishery Restoration EIS and subsequent Master EIR do not adequately describe or evaluate impacts from the proposed projects, and a more robust monitoring plan to quantify impacts and benefits to aquatic communities should be instituted to track progress and help direct adaptive management. D
- 2) The scope of projects have diverted substantially from the original scope/intent as defined by the ROD, and therefore full EIS/EIR should be mandatory for each project moving forward, to protect the river and aquatic communities. C

Our position, supported by tens of thousands of hours of observation on the river, by professional fishing guides who've been on the river for decades, is that many of these projects -- especially the large-scale projects incorporating heavy mechanical operations on the river -- are not only failing to improve fish production but are, in fact, creating "dead" sections of river where adult fish no longer habituate. E

The Phase I Review supports these observations, essentially concluding that after a decade of projects there are no more fish than there was before construction began, and demonstrating that juvenile fish habitat has only increased 1.2-1.6% per year at base flows, far less than the 400% minimum goals. Too, juvenile fish habitat did not increase at all during the 3 year review period, despite millions of dollars spent to attain that goal. This Phase I Review has been available for TRRP staff for a while, yet they have delayed releasing it to the public; the only logical reason is because it is a detracting assessment for the projects to date, specifically addressing the lack of study on the part of the TRRP and their failure to adhere to the ROD and increase any fish production in the river. The goal of the ROD was increased fish production; too many project designs have gotten way off track, focusing solely on juvenile habitat and effectively reducing vital adult holding water. F

Likewise, the "secret" Phase I Review indicates that ROD flows are capable of eroding riparian berms, and mechanical intervention may not even be necessary as originally thought. G

It is imperative that all projects from hereon out have an EIR and EIS before any more work is done. It is time to challenge the efficacy of every project (past, present, and future). They should be stopped and studied, given an opportunity for the scientific method to actually study their impact -- both positive and negative -- to the river. In other words, to actually test their hypotheses before plowing forward with more potentially destructive designs. To even present these two projects knowing that more study is recommended, is just plain wrong. H

The TRRP has allowed the TRGA and other stakeholders to have minor input over the past few years. This we appreciate, and feel has helped several of the projects in recent years to be less disastrous than they otherwise would have been, but there is still a mentality amongst some within the TMC and TRRP that they are going to continue to do what they're going to do, regardless of the considerable observed negative impacts to the river. We hope we can continue working together to change this dialogue for the positive by embracing new ideas and ultimately translating to near and long-term benefits to the Trinity River fishery.

Unfortunately, these are the unintended consequences of restoration, and those paying for it are the salmon and steelhead that it's supposed to be helping. Restoration appears to be destroying the river instead of helping it, and that failed process should be stopped now. Let the river recover. Review what's been done. Study the impacts and develop, along with the various stakeholder groups, a more effective strategy, rather than continuing to plow forward blindly.

The EIR/EIS should allow for a minimum two cycles at flows of over 10,000 cfs before allowing any additional mainstem river projects to be considered. It is only at these high flow events when the river is able to affect considerable change, and therefore only at these higher flow events that the projects will prove to either completely fail, or show that, with time and high water, they can demonstrate the dynamic river system that these projects are supposed to be creating.

I

The ROD calls for a study period after Phase I review, and the Phase I Review clearly shows that a break in construction of these projects is appropriate, as was originally suggested in the Implementation plan for the Trinity ROD, page C-8, Appendix C: *"In interim period without construction activities may be necessary to fully evaluate the effectiveness of project designs and the effect of the new flow regime before beginning construction on the remaining sites."*

J

By not stopping to study and learn from projects, the TRRP is technically violating the ROD. The ROD also calls for only 3 side channels and minimal mechanical restoration work, relying on flows to make the changes. Rather, we've seen countless side channels and split flows, major mechanical revision to the river, and no time for high flow events to allow the river to correct itself. The ROD and Master EIS also do not mention Engineered Log Jams (ELJs), of which many have been incorporated into recent projects. These ELJs are aesthetical eyesores and potential in-river hazards, with no documentation as to their actual success in accomplishing ROD goals.

K

Moreover, the TRRP is not addressing water temperature studies. The over-abundance of gravel into the river -- both through augmentation and infusion related to TRRP projects -- has resulted in a shallower river. Shallower water allows more sunlight to reach the bottom, resulting in both warmer water temperatures and increased weed growth.

L

Guides on the river this fall and winter have observed more spawning redds below the north fork than we've ever seen; there are two theories for why this is happening: 1) it could be a byproduct of salmon NOT wanting to spawn in the construction zones, where unnatural gravel, loud noise, and the remnants of the mechanical process deter the fish from the native processes; or 2) the warmer water temperatures -- results of too much gravel -- are causing salmon and steelhead to stay longer in the deeper pools where there is cooler water and more oxygenation; there are fewer deep pools in the upper river where mechanical restoration and heavy gravel augmentation has occurred, so the fish are staying lower in the river, or coming up and heading back down river to find suitable habitat.

Moreover, guides in recent months have observed salmon and steelhead turning around and returning downriver after encountering TRRP project zones. Without the deep pools and holding water, combined with too-warm temperatures related to too much gravel, the fish are avoiding the upriver sections where these projects are devastating the river environment. Either way, these recent observations are yet another reason that projects need to be studied further before any new projects are discussed.

M

In the meantime, we recommend any available funds to be directed towards two areas:

- 1) The first is active pre and post project monitoring of any past, current, or future project.
- 2) The second is directing funding and attention towards the watersheds or tributaries. This was another recommendation of the ROD, and another one that has been largely ignored, as near countless millions of taxpayer dollars has been spent on mainstem projects (that appear to be failing), and almost no effort has been directed towards the tributaries (i.e., road decommissioning, culvert removal or retrofitting, meadow restoration). Such projects that would be almost instantly beneficial would be fine sediment reduction, fish passage projects, and additional tributary access and habitat restoration.

N

Small watershed restoration projects are a known and proven means of improving juvenile salmonid habitat survival but are not being considered as an alternative to the mainstem projects, which have yet to be shown significant benefits but certainly significant impacts.

In conclusion, the TRGA recommends that these projects be denied until further environmental review can occur. We recommend the TRRP change trajectory and focus on studying the efficacy of past projects while turning restoration

efforts towards the watersheds, as originally envisioned in the ROD. There are almost no benefits that have been empirically demonstrated from these projects, and yet the negative impacts have been significant, as observed and documented by TRGA members and other sportsmen, landowners, and other stakeholder groups. It's time for a change. Let's change the direction of the Program and shift our attention and resources towards the tributaries and active pre and post project monitoring. If, in spite of the significant evidence to the contrary, mainstem projects are still under consideration, the preparation of a full EIR and EIS is absolutely mandatory.

Respectfully submitted,

Trinity River Guide Association

Steve Townzen, President

Board of Directors:

Liam Gogan

Michael Caranci

Travis Michel

Bill Dickens

E.B. Duggan

Paul Catanese

Chris Parsons

Scott Stratton

CC:

Brian Person, Chair

Trinity Management Council

Bureau of Reclamation

16349 Shasta Dam Blvd

Shasta Lake, CA 96019

Matt St. John, Executive Officer

North Coast Regional Water Quality Control Board

550 Skylane Blvd, Suite A

Santa Rosa, CA 95403

Response to Comment Letter 19

This letter contains 14 distinct comments (A-N). Following are the responses to those comments.

Comment 19.A – Collaboration need.

We strongly agree with this comment and believe that the TRGA and other stakeholder input is essential to achieve a thorough, transparent, and collaborative design approach to channel rehabilitation projects. Without stakeholder input, the designs would be void of the critical experience and river knowledge that local fisherman, landowners, and the river community brings to the table. We recognized that key stakeholder input during strategic planning phases was missing in our design process, and began to better reach out to various stakeholder groups beginning around 2011. We feel that purposeful and formal stakeholder input is a necessary part of the Program's adaptive management framework. The design and planning process is dynamic and will continue to evolve overtime in order to gather information needed to optimize and refine future projects.

The TRRP has been very purposeful about engaging the TRGA since 2011 and has consistently reached out to the larger public, TRGA members, and other organizations in various forums to help solicit their input and expertise. TRRP staff and partner organizations have consistently met with the TRGA and collaboratively met together through on-site field visits to projects, river floats, TRGA meetings, Joint Design Team and stakeholder meetings/workshops, informal discussions at the TRRP office, and community meetings. TRGA members have even assisted at TRRP channel rehabilitation sites (e.g., at Lorenz Gulch in 2013; NCRWQCB et al. 2013a) to direct the installation of habitat features and to describe desired boat ramp conditions for construction.

Many recent projects have been modified based on TRGA fishing guide input and expertise. Some of the key design features installed on recent projects were based on TRGA fishing guide recommendations and input. For example, at the Upper Junction City project in 2012, one TRGA recommendation was to move the split flow channel complex farther upstream so that the flow would converge at a location that would help maintain adult holding habitat. This feature works at the Upper Junction City site today.

Below is a list of stakeholder meetings where TRRP staff have met with the TRGA and received input:

- **September 19, 2012:** Attended TRGA Meeting to discuss Lorenz Gulch and Douglas City Design.
- **October 1, 2012:** Joint Design Team TRGA field trip to look at newly constructed Upper Junction City and Lower Steiner Flat projects and stopped by Lorenz Gulch and Douglas City to discuss the initial design process.
- **November 14, 2012:** Joint Design Team and Stakeholder meeting to discuss Lorenz Gulch and Douglas City Designs (TRGA present).
- **December 19th, 2012:** Attended TRGA Meeting to discuss Lorenz Gulch and Douglas City Designs.
- **February 20, 2013:** Attended TRGA Meeting to discuss the Lorenz Gulch and Douglas City Designs and Gravel Fill Analysis with Dave Gaeuman.
- **March 27, 2013:** Joint Design Team and TRGA float to discuss past, current, and future projects: Put in at Indian Creek Boat Launch and took out at Evans Bar. Stopped and discussed the following projects during the float: Indian Creek, Douglas City, Reading Creek, Lower Steiner Flat, Lorenz Gulch, Dutch Creek, and Lower Junction City. Also discussed Bucktail design during the float.
- **June 4, 2013:** Joint Design Team and Stakeholder Meeting to discuss Lower Junction City, Bucktail, and Dutch Creek designs (TRGA Not Present).
- **July 9, 2013:** On-Site Public Meeting to discuss Lorenz Gulch Construction.
- **July 10, 2013:** On-Site Public Meeting to discuss Douglas City Construction.
- **July 12, 2013:** VE Study Public Meeting - Out-briefing Presentation on Lower Junction City, Bucktail, and Dutch Creek at the Trinity County library.

- **November 4, 2013:** Junction City Public Meeting to discuss the Junction City design.
- **November 5, 2013:** Lewiston Public Meeting to discuss Bucktail design.
- **November 20, 2013:** Attended TRGA Meeting with Dave Gaeuman to discuss Lower Junction City and Bucktail Designs.
- Dave Gaeuman met with the TRGA on-site at Lower Junction City design - not sure on the date.
- **December 17, 2013:** Public Meeting at the Weaverville Library to discuss the Lower Junction City and Bucktail designs, held during the 30 day NEPA comment period.

We look forward to our continued partnership on future projects.

Comment 19.B – Bucktail design does not incorporate TRGA and public input.

Not all comments have been incorporated into the designs presented in the DRAFT EA/IS (NCRWQCB et al. 2013b) but the recommendations have been noted. In some cases, such as in deciding the future location of the Bucktail boat access, land managers are interested in receiving all stakeholder input (written and oral) on the Draft EA/IS before making a final management decision. In other cases, designs have been modified to achieve more functional features but the environmental document diagrams, figures, and description lag slightly behind the design document and its figures. In these cases, the environmental impacts of the project displayed in the Draft EA/IS would be similar to or greater than that of the designs under current consideration. Consequently, required mitigation measures to mitigate construction impacts would remain the same, but the long-term functionality of particular features may change dramatically in performance.

The commenter notes that they have disagreed with the split flow and mechanical re-routing of the river. This is depicted at IC-4 in Figure 4 of the Draft EA/IS, and is shown in Figure 19.B.1 below.

The Bucktail design presented in Figure 19.B.1 (and in the Draft EA/IS) was the result of efforts to maximize juvenile salmonid habitat both immediately post-construction and into the future. Other factors leading to the design presented in Figure 19.B.1 included geomorphic and riparian design objectives. However, to achieve a successful relocation of the mainstem channel and achieve desired short and long term habitat benefits, it was determined that a large engineered log and rock structure, spanning the entire mainstem Trinity River channel, would be needed. This structure would have to be designed to survive maximum fisheries flow releases (approximately 11,800 cfs) to meet long-term goals. The size and stability of the proposed structure needed to relocate the river raised concerns that the channel would be unable to rework its bed and banks into the future.

Therefore, Project Areas IC-1, IC-3, IC-4, IC-5, and ELJ-2 design features are under revision to address both internal design group and public concerns.** The present concept, shown in Figure 19.B.2, includes a split channel without the engineered log jam (ELJ-2). This configuration and potentially other variations which are less extreme than that presented in the Draft EA/IS, will be evaluated to ensure that fish habitat, geomorphic, and riparian objectives are maximized, and that the risk of adverse long-term impacts (e.g., locking the channel in a fixed location) is minimized in the final Bucktail design recommended for implementation.

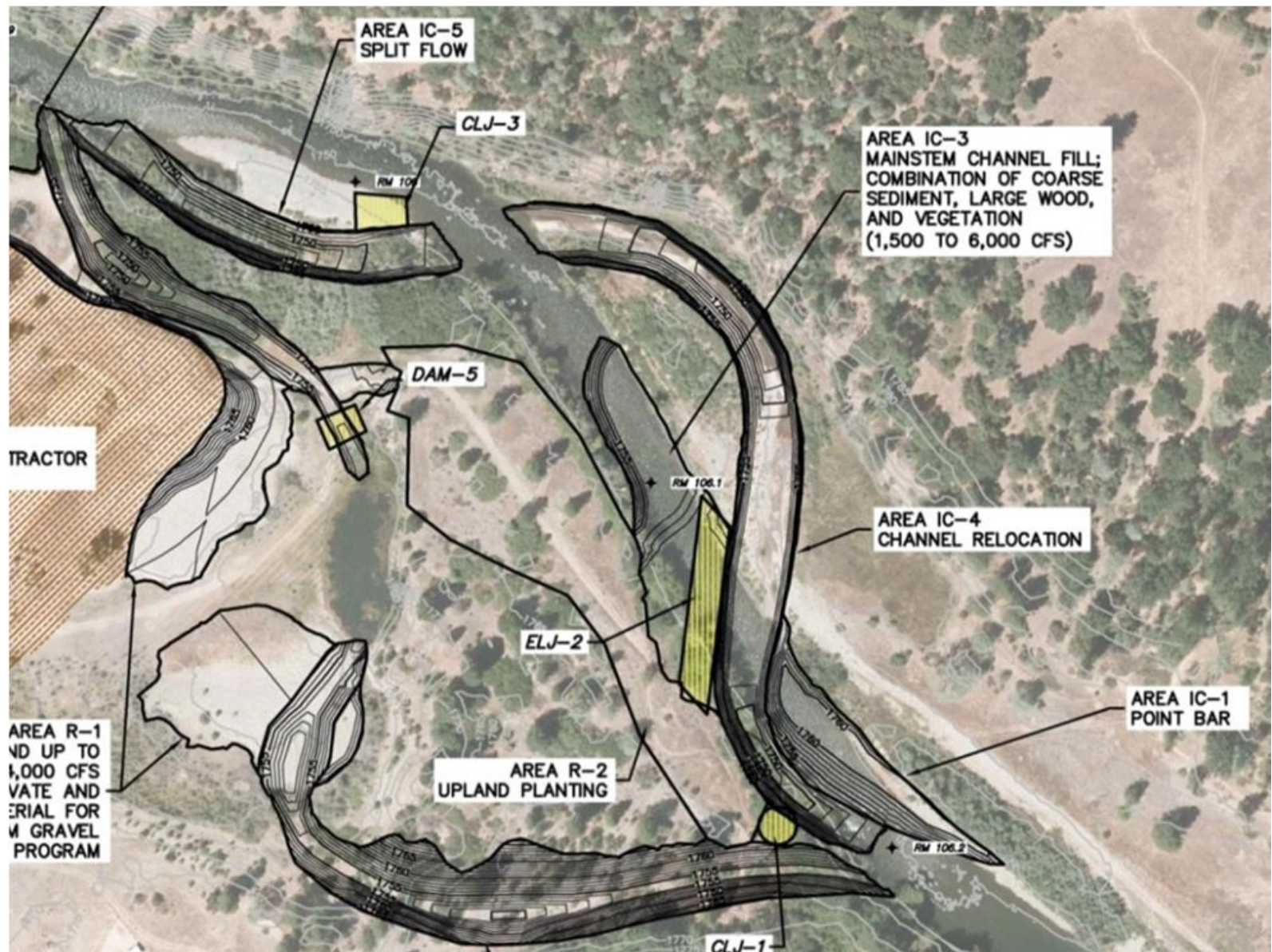


Figure 19.B.1. Upstream portion of the Bucktail Rehabilitation Site design as described in the Draft EA/IS.

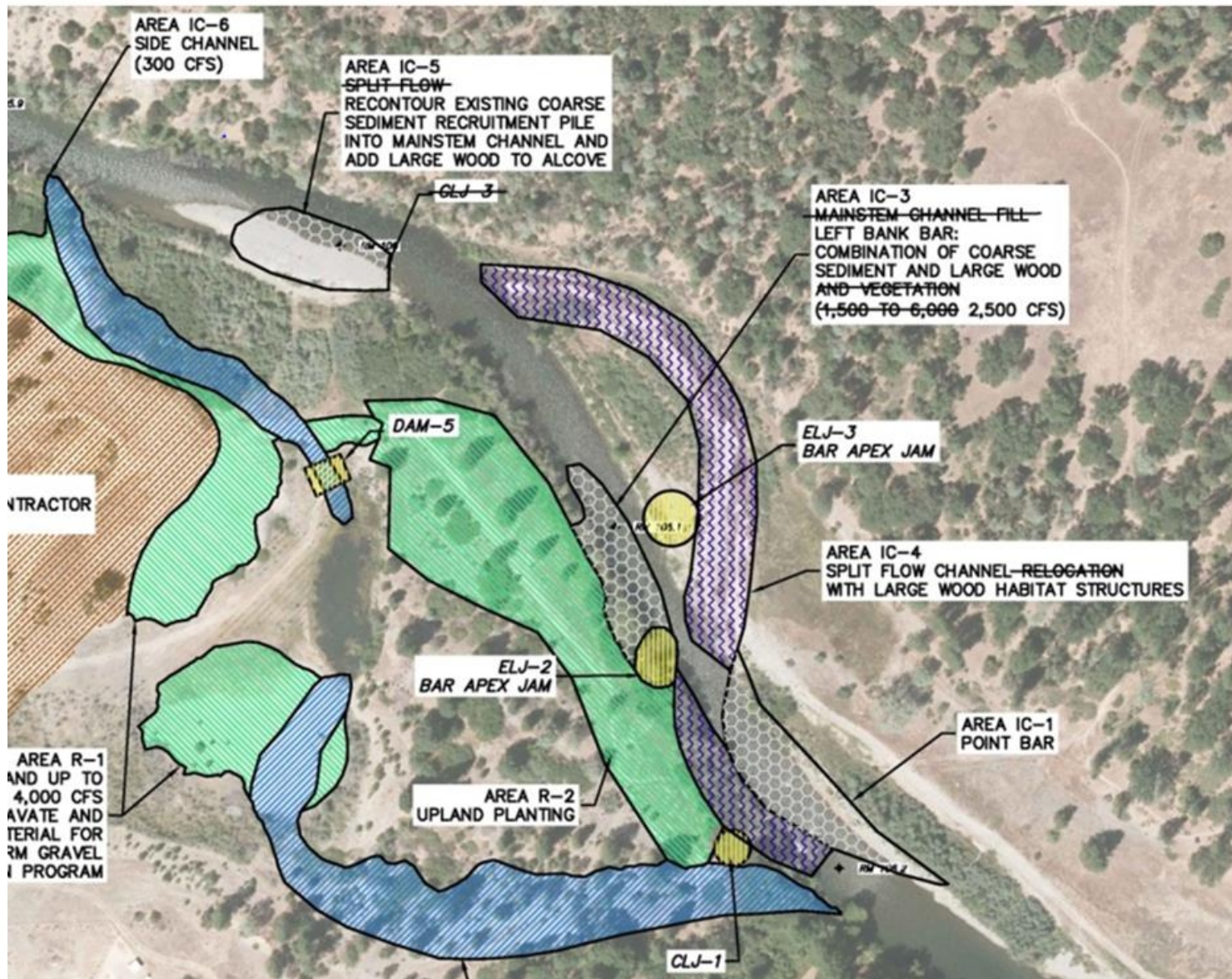


Figure 19.B.2. Current proposed revisions to the upper portion of the Bucktail channel rehabilitation site design.

Currently, 2-D hydraulic models are being used to predict and compare Chinook fry and pre-smolt habitat under various design alternatives in order to determine riverine features which best achieve short-term fish habitat goals and objectives. Geomorphic and riparian goals and objectives are also evaluated using hydraulic modeling output and other methods.

Modeling output of juvenile chinook fry and pre-smolt habitat for the current proposed Bucktail design configuration (Figure 19.B.2) versus the Draft EA/IS design (Figure 19.B.1) are compared in Table 19.B.1.

The current habitat area compared to the Draft EA/IS Bucktail design shows a 200% to 400% increase in Chinook fry and pre-smolt habitat for a streamflow of 1,200 cfs (Table 19.B.1, the lowest habitat area value for Draft EA/IS conditions). The side channels shown in Figure 19.B.2 (shown with blue fill), account for more than 50% of the overall habitat gains shown in Table 19.B.1.

Table 19.B.1. Draft EA/IS (Figure 19.B.1) and current Bucktail design (Figure 19.B.2) habitat area (ft²) are compared for Chinook salmon fry and pre-smolt rearing. Outputs are from 2-D modeling of depth and velocity at flows of 300 cfs, 1,200 cfs, and 2,000 cfs.			
Bucktail IC-4 area design comparison	300 cfs	1,200 cfs	2,000 cfs
Draft EA/IS conditions - fry	61,663	38,600	88,149
Current design fry	236,012	200,147	182,397
Change between existing and 50% design conditions for fry habitat (%)	283%	419%	107%
Draft EA/IS conditions pre-smolt	126,933	80,988	162,596
Current design pre-smolt	429,926	351,419	391,798
Change between Draft EA/IS and 50% design conditions for pre-smolt habitat (%)	239%	234%	141%

Refer to response to comment 23.E for additional information concerning condition of the Bucktail Bridge and the potential for bridge replacement.

Comment 19.C – Projects are inconsistent with the ROD. Environmental documentation is inadequate.

Refer to response to comment 23.A and 23.D for information concerning variations from the ROD and the direction of present designs. Refer to response to comment 23.A. in general and 23.Y for information concerning the adequacy of environmental documentation for the proposed Bucktail and Lower Junction City channel rehabilitation projects.

Comment 19.D – Impacts not properly evaluated. Monitoring is poor.

Refer to response to comment 23.C, 23.M, and 23.O concerning project impact analyses and mitigation.

Comment 19.E – Projects hinder fish production and impact adult holding

Refer to response to comment 23.B for information concerning fish production and use of channel rehabilitation projects by adult salmon. Refer to response to comment 23.U concerning adult holding habitat.

Comment 19.F – Draft Phase I review does not support projects and benefits to habitat.

Refer to response to comment 23.B concerning Program evaluation.

Comment 19.G – Mechanical intervention may be unnecessary.

Current ROD restoration releases are less than half the high flows needed from eroding riparian berms and periodically removing mature riparian trees. Refer to comment 23.A.2 for additional information.

Comment 19.H – A pause in construction is needed for additional study.

Because the TRRP uses an adaptive management approach to restoration efforts, coordinating through its science program to its implementation branch and back again, studies follow actions in a continuous loop. The AEAM component of the Program is designed on an iterative process of identifying and evaluating data that are used as starting points for the next iteration, building improved function through assessment of a perpetually changing stream of information.

Refer to response to comment 23.K.1 for additional information concerning the need for a break from the construction of channel rehabilitation projects. Refer to response to comment 23.A.1 concerning the adequacy of environmental documentation.

Comment 19.I – Allow additional high flows before additional mainstem projects are considered.

Geomorphically effective flows that may improve dynamic conditions on the Trinity are relatively rare (e.g., extremely wet years occur 12% of the time and wet years 28%). Consequently, it is important to construct channel rehabilitation sites now so that they may achieve projected transformation with the range of limited, available restoration flows, and initiate restoration of the fishery resources in a timely manner.

Refer to response to comment 23.I for additional information concerning the need for continued restoration.

Comment 19.J – Pause for study after Phase I.

Refer to response to comment 23.K for information concerning the need for a break from channel rehabilitation site construction.

Comment 19.K – Channel rehabilitation program is inconsistent with the ROD.

Refer to response to comment 23.A.2 and 23.D for information concerning consistency with the ROD. Response to comment 23.D details the Master EIR's extensive reference to the use of large wood.

Comment 19.L – Overabundance of gravel in river has resulted in warmer water.

Trinity River water temperature is largely controlled by cold water releases from Lewiston dam which maintain the river at much colder than historic temperatures during summer. Adequate reservoir levels in Trinity Lake deliver cold water to the Trinity River, and the river remains cold at the constant base flows. The Trinity River temperature is measured at Douglas City and above the confluence with the North Fork Trinity River for regulatory compliance specified in State Water Resources Control Board Order: WR 90-5 (SWRCB 1990). Temperature targets, which were set to protect holding salmon, are constantly monitored to ensure compliance with the summer (July 1 – September 15) regulatory target of 60°F at Douglas City. This temperature target is rarely exceeded (e.g., there were no days when the mean river temperature exceeded the target temperature of 60°F in summer 2013). No changes in water temperature have been linked to gravel augmentation.

While salmonids require cool, well-oxygenated water to thrive, constant and uniformly cold water can reduce growth rates. This is because fish growth rates are largely dependent on water temperature, much like the growth rates of other aquatic organisms such as foothill yellow-legged frog and western pond turtle. Adult holding river salmon that wait to spawn in the fall do require consistent cold temperatures but growing juvenile salmon and steelhead prefer warmer temperatures than those preferred by adults. What is more, yellow legged frog and western pond turtle prefer even warmer temperatures than the young salmon – so cold but spatially variable temperatures are desired downstream of Lewiston dam rather than uniformly cold conditions.

One management strategy for maintaining cold water temperatures downstream to the North Fork (and beyond) while providing relatively warm water pockets in the Lewiston area is to promote the growth and movement of gravel bars. Bars and other topographic features that result from the fluvial transport of coarse sediment influence temperature, so that some areas are colder or warmer than the mainstem. This

creates natural thermal heterogeneity and local temperature refugia for various riverine species. Augmenting the gravel supply that is limited by the dams, allows the river to transport sediment and create deposition, scour, and other processes that produce temperature variances. Aquatic organisms, including young salmonids, take advantage of this diversity of microenvironments while the main channel water temperature remains more constant.

Refer to response to comment 23.B for additional information concerning Trinity River gravel and temperature.

Comment 19.M – Fish avoid use of channel rehabilitation zone.

There have indeed been small increases in the number of redds observed downstream of North Fork Trinity River in recent years. However, there have been increases in portions of the river upstream of North Fork as well, such as in the zone of the Canyon Suite of sites constructed 2005 to 2011. Lower salmon spawning density has been experienced in the mainstem near the Trinity River Hatchery. Stray hatchery fish that spawn here, as well as their progeny, can dominate the spawning population in the upper portion of the mainstem near Lewiston in some years (with detrimental effects to the production of natural fish). The occurrence of hatchery strays has generally decreased in recent years. Confounding influences of hatchery fish and the changing gravel quality since the last large-scale gravel placement in 2007 make interpretation of changes in spawning density here difficult at best.

Up and downstream movement of adult salmon is a common natural occurrence as fish seek their natal spawning area (Connor and Garcia 2006, Kucera and Orme 2006) – and especially among males which often roam widely seeking mates. This roaming behavior among males is why we use the distribution of female carcasses only to estimate redd numbers by species (Chinook vs. coho salmon) and origin (hatchery vs. natural). Downstream movement is also a common flight response of salmonids frightened by possible predators and boats. It would be surprising and abnormal to observe no downstream movement. Chamberlain et al. (2012) report on the distribution and abundance of Chinook salmon redds in the mainstem Trinity River if you're interested in additional reading on this subject.

Refer to response to comment 23.B for additional information on Trinity River spawning and temperature.

Comment 19.N – Place your emphasis and funding in these areas.

Thank you for your input. The TRRP is continually updating and improving our monitoring and adaptive management techniques. Presently we are developing a Decision Support System (DSS) based on recommendations from our Scientific Advisory Board. As for the watershed, the TRRP agrees wholeheartedly that watershed work is vital to the Trinity River restoration effort. Consequently, we continue to support local watershed restoration efforts financially and technically whenever possible.

Refer to response to comment 23.B for more information on TRRP data analyses and programmatic evaluation. Refer to response to comment 23.D and 23.I for additional information on the TRRP's developing DSS. Refer to response to comment 23.A.1 and 23.A.3 for additional information on the TRRP's watershed restoration work and authority to conduct work.

Comment Letter 20

1/5/2014

N.C.R.W.Q.C.B.
5550 Skylane Blvd.
Suite A
Santa Rosa, CA
95403-1072



Attention Mr. St John and Ms.

My name is Herb Burton. I am a 31 yr. Trinity County resident and local merchant, owner of the Trinity Fly Shop. I have an unusual obsession with the Trinity River, largely because I have devoted half of my life as a commercial Trinity River fishing guide, annually floating the river 800-1100 miles for the past 31 years.

I am writing because I question the direction of the Trinity River Restoration Program and have serious concerns regarding past and future mechanical main stem restoration projects (Sites- (Bucktail and Lower Junction City- Draft EA/Initial Study DOI-BLM CA-N060-2014- 014-EA and TR EA0114) slated for 2014.

After floating thousands of miles and logging years of guided fishing trips on the Trinity River, my field experiences have been a lifelong learning curve that has surprisingly revealed vast uncertainties reflecting little predictability; there are more questions than answers. Oddly, I've accepted I know very little about the Trinity River. Strange it only took 30 plus years to figure this out.

I have learned, without question, you cannot fully restore the Trinity River without incorporating secondary rivers and tributaries. These waters are vital components of the watershed contributing broad "native" fish diversities and continuity of hundreds of miles (three secondary rivers, over forty-one tributaries intercepting the main stem), of prime staging, spawning and rearing habitats that ultimately represent the true hatcheries for native fish stocks. It has been documented tributary and small watershed projects are known and proven means of improving juvenile salmonid habitats. So why have these primary secondary waters been largely ignored by the TRRP? Why not ensure fish passage and maintain hundreds of miles of quality staging, spawning and rearing habitats for native fish stocks? Why not help curb and or even stop sediment loads, at the source, before infiltrating the main stem. Why not help to ensure desirable water flows, temperatures and qualities by restoring lands impacted by floods, fires, logging, road construction and poor farming practices?

A

B

Requesting and advocating the need for tributary and small watershed restoration is not something new. Years prior to the 2000 ROD, *Friends of the Trinity River* (FOTR), headed by the late **Byron Leydecker**, preached to the TRRP the vital need to include these primary secondary waters if a fully restored Trinity River is to be achieved. Many supported and firmly believed tributary and small watershed restoration would ultimately be a more successful alternative

and better use of restoration funding. Unfortunately TRRP's requests fell upon deaf ears. Instead, the TRRP opted for mechanical main stem projects that have proven costly, riddled with design/construction flaws and currently reflect questionable results at best.

As a result of the TRRP implementing years of mechanical main stem projects, most anyone familiar with the upper reach (Lewiston-North Fork) has observed the following negative impacts; Major deep water pools that served as cool sanctuaries for transitioning and staging fish have filled in and no longer exist. Tailouts and highly oxygenated riffles and pocketwaters have been drastically altered and eliminated by aggressive channel manipulation, construction side channels and or suffocated by gravel loads and injections; ultimately effecting the dynamics of the river, anadromous fish behavior and migration patterns. Increasingly noticeable are the dwindling numbers of staging and spawning adults throughout the entire upper reach; a reflection of too much unnatural gravel limiting water compositions, impacting aquatic insects and micro invertebrates, the lack of deep water pools and simply native fish stocks unable to adapt and spawn in altered construction sites. The greater numbers of constructed spawning channels have filled in, are dry, and no long offer any value or benefit to juvenile salmon-steelhead. During project construction, noise, erosion and water turbidity levels have been unacceptable and a deterrent to fish, fishermen and recreationalists. Sadly, the upper reach has been transformed into a manufactured, shallow, gravel raceway straight to the Lewiston Dam.

C

D

E

F

To date, ***there is no west coast anadromous watershed that has ever been fully restored with projects of this nature.*** Yet, the TRRP continues to write the manual and invest millions of restoration funding into controversial mechanical main stem projects, that according to the (TRRP) Science Advisory Board, increase juvenile salmonid habitat by only 1.2%-1.6% a year per base flows; less than the 400% minimum goals. Juvenile fish habitat didn't increase at all during the Phase I (3 yr.) Review period, despite millions spent. Investing restoration funds in costly projects that reflect adverse impacts and add little to no value to watershed-fishery restoration is not only a waste of restoration funding but makes absolutely no sense!

G

The TRRP is losing credibility and support. Habitat creation has not been achieved and TRRP fishery restoration goals are constantly not being met. Obviously, it is time for a change. All mechanical main stem projects should be stopped and restoration efforts and funding should be directed towards tributary and small watershed restoration as an alternative to achieve juvenile salmonid habitats and restoration goals.

H

Troubled Waters;

Herb Burton
Trinity Fly Shop
P.O. Box 176
Lewiston, Ca 96052

CC.

Brian Pearson, Chair
Trinity Management Council
Bureau of Reclamation
16349 Shasta Dam Blvd.
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Trinity River Restoration Program
P.O. Box 1300
Weaverville, CA 96093

Trinity Adaptive Management Work Group
P.O. Box 128
Douglas City, CA 95024

Response to Comment Letter 20

This comment letter contains 8 distinct comments (A-H). Following are the responses to those comments.

Comment 20.A – Tributaries have been ignored.

The lead agencies agree that recovery of the watershed is critical to Trinity River fish populations. The TRRP has been actively involved in watershed efforts in tributaries via partnership and cooperation with federal, state, county and tribal entities that have primary responsibility for tributary lands, waters, and/or fisheries. The Program combines funding with partners (U.S. Forest Service, California Department of Water Resources- Integrated Resource Management System (IRMS) and cooperators (U.S. Bureau of Land Management (BLM), Trinity County Resource Conservation District (TCRCD), Five Counties Salmonid Conservation Program (5Cs), Natural Resource Conservation Service, Northwest California Resource Conservation & Development Council, Watershed Resource and Training Center (WRTC), and also provides additional funds to the TCRCD to coordinate watershed projects. From the first joint projects initiated in 2008 through 2014, the Program has provided \$3 million in matching funds to project co-sponsors (see Table 23.A.3 in response to comment letter 23).

Some projects reduce fine sediment inputs to tributary and mainstem waters; others increase fish access to blocked tributary habitat. These projects meet TRRP objectives while helping basin-wide efforts to remediate old mining, logging, and roads damage. The TRRP co-funds projects that replace culverts to keep water in stream beds to increase unrestricted flow in tributaries, and decommission old Forest Service roads to improve water quality. Watershed projects that include installation of fish friendly culverts provide access to quality spawning habitat maintained and improved through sediment reduction projects. Though cleaner substrates likely have resulted from both watershed restoration and increased mainstem (ROD) flows, recent substrate sampling on the Trinity River (between Lewiston and Junction City) indicates that gravel conditions at all 2001 sample sites have improved since the earlier study (Graham Matthews and Associates 2010).

TRRP land management partners and local resource conservation organizations provide public information about cooperative watershed projects in the TCRCD's quarterly newsletter, the Conservation Almanac. The TRRP fully funds the printing and distribution of the Conservation Almanac as part of cooperative outreach efforts in the basin. All project designs leveraged with TRRP funding such as a bank naturalization (biostabilization/revegetation) design provided to private landowners in 2013, are available upon request. These cooperative efforts among collaborating TRRP partners, local resource conservation entities, non-profit organizations, and private citizens reflect the basin-wide commitment to restore the Trinity River.

All project designs leveraged with TRRP funding such as a bank naturalization (biostabilization/revegetation) design provided to private landowners in 2013, are available upon request. Refer to Figure 20.A as an example.

Comment 20.B – Address fish passage, maintenance, sediment load.

Refer to response comment 23.A.3 and 23.A.4 for additional information concerning watershed restoration.

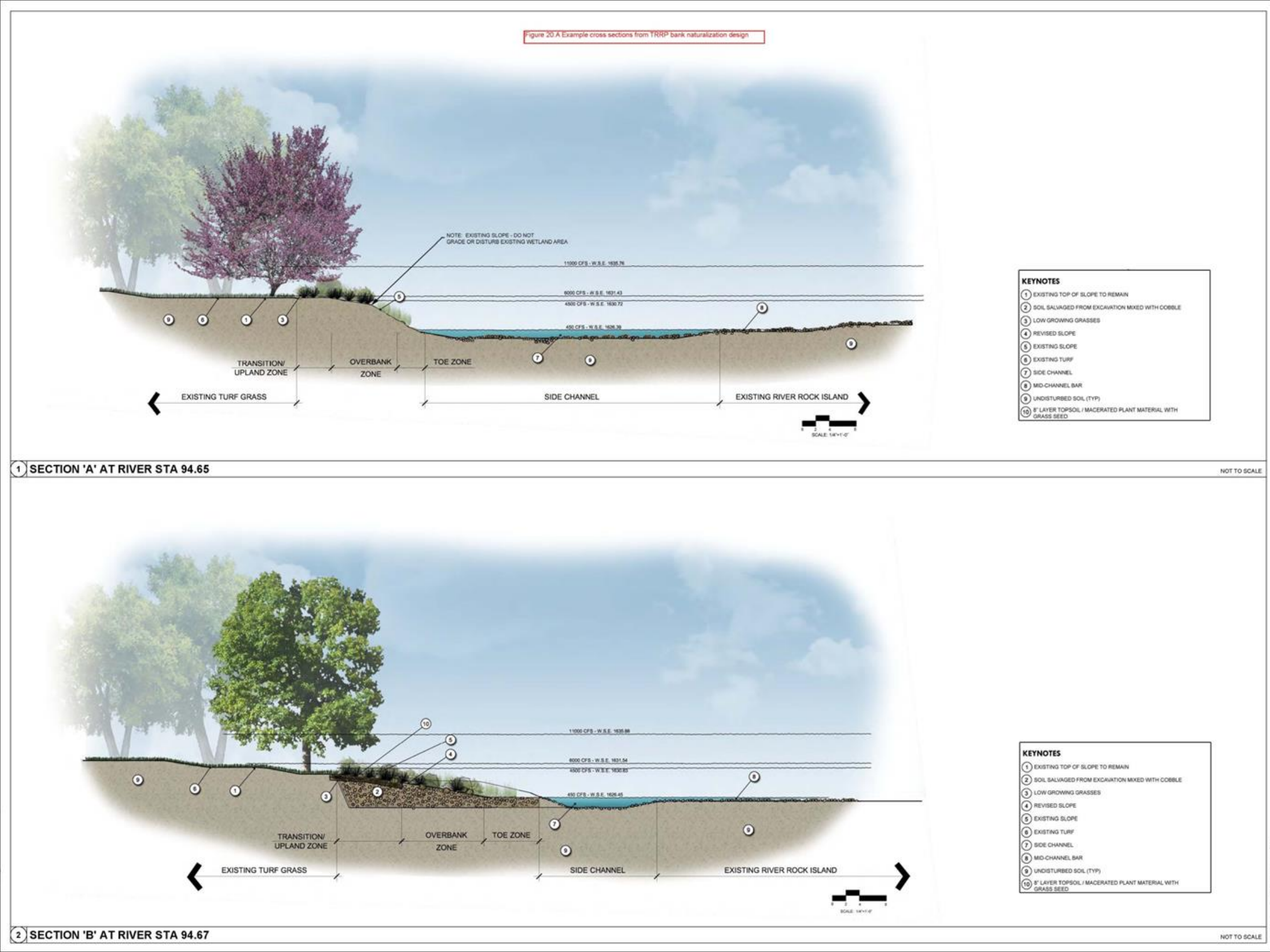


Figure 20.A. Example Bank Naturalization Project.

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Comment 20.C – Deep pools have filled in/no longer exist.

Concerns from stakeholders about pool filling, especially over the addition of gravel to the river, are shared by the TRRP. Bathymetric data acquired between 2009 and 2011 to evaluate how pool depths along the Trinity have changed over that period are reported by Gaeuman and Krause (2013) in their report entitled “Assessment of pool depth changes in the Trinity River between Lewiston Dam and the North Fork Trinity River.” The report is available on the TRRP website at: <http://odp.trrp.net/Data/Documents/Details.aspx?document=2110>

Refer also to response to comment 23.U for information concerning pool filling on the Trinity.

Comment 20.D – Dwindling adults result from unnatural gravel.

The ROD directed the TRRP to implement a gravel supplementation program in the reaches below the dam. The intent of introducing coarse sediment (gravel) downstream of the dams was to replace gravel that had washed downstream and not been replenished naturally since closure of the dam. Current evaluations now indicate that the post-dam coarse sediment deficit has been substantially reduced or possibly eliminated by TRRP augmentation (Gaeuman 2013); however, there will be a perpetual need to replace gravel that moves downstream from the Lewiston dam. The TRRP is now working to develop a long-term strategy to balance river transport with appropriate gravel augmentation. The plan will recommend a strategy and rationale to meet reach specific coarse sediment needs between Lewiston and Indian Creek so that ecological requirements (to sustain biological and physical processes) are met. A gravel management plan for public review and input is expected to be developed by fall 2014.

As for the number of spawning adults in the river, various factors, many of them outside of the Trinity Basin affect these numbers. The most recent California Department of Fish and Wildlife (CDFW) annual report for the Trinity River Basin Salmon and Steelhead monitoring project 2010-11 season (Sinnen et al. 2013; <http://odp.trrp.net/Data/Documents/Details.aspx?document=2120>) suggests that the natural contribution of fall run Chinook salmon upstream of Willow Creek has been increasing over the last 10 years, and that overall salmon and certainly steelhead numbers have also been trending positively. Figure 20.D below, produced from 2012 CDFW data, also supports this increasing trend in naturally produced Trinity River fall-Chinook salmon.

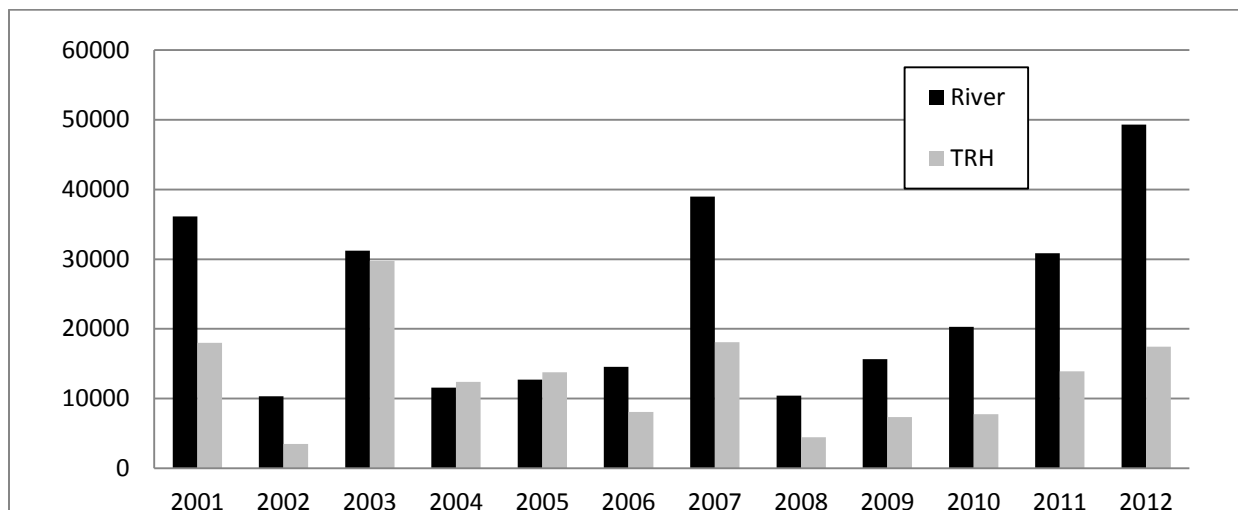


Figure 20.D Total adult fall-Chinook escapement to Trinity River natural areas (River) above Willow Creek weir and TRH 2001-2012. (Draft figure from 2012 CDFW Trinity River basin salmon and steelhead monitoring project, 2012-2013 season report).

Refer also to response to comment 19.L for information concerning gravel and water quality and to 19.M for information on the use of channel rehabilitation sites by adult salmon.

Comment 20.E – Constructed spawning channels have filled in, are dry, no longer offer any value.

Side channels increase edge habitat. Where water flow is slow and shallow, this edge habitat equates to juvenile fish rearing area. The TRRP has constructed perennial side channels as well as overflow channels which are meant to engage at river flows greater than base flow. These habitat features have been designed to provide juvenile habitat at various flows as well as to support riparian revegetation and riverine processes. The TRFEFR (USFWS and HVT 1999) specifically noted the decrease in Trinity River rearing habitat between approximately 300 and 2,000 cfs as a limiting factor for anadromous salmonids. The depths of these constructed features may vary through the year, but they continue to provide fish and wildlife habitat in their various forms at the flows in which they are designed to engage.

Refer to response to comment 23.B and to 23.D for additional information on current channel rehabilitation design feature objectives and performance.

Comment 20.F – Noise, erosion and water turbidity levels have been unacceptable.

The effects of project construction are mitigated for as outlined in the Master EIR (NCRWQCB and USBR 2009) and in the Draft Bucktail and Lower Junction City EA/IS (NCRWQCB et al. 2013b).

Refer to response to comment 23.M for a general review of environmental impacts and their mitigation addressed in the Draft EA/IS. Comment response 23.N addresses potential public access impacts. Comment response 23.O potential river navigation impacts; Comment response 23.P.1 potential noise impacts; Comment response 23.P.2 potential traffic impacts; and Comment response 23.Q potential turbidity impacts.

Comment 20.G – No west coast anadromous watershed that has ever been fully restored, waste of money.

It is true that no west coast anadromous watersheds have been fully restored. Human development that includes mining, logging, road building, and other invasive practices have left a watershed legacy in many areas similar to that of the Trinity River. The Trinity River is benefitting from implementation of all of the ROD components (e.g., restoration flows, infrastructure improvements, watershed enhancement, fine and coarse sediment management, channel rehabilitation, and an adaptive environmental assessment and management program) to mitigate for ecosystem damage done by the Trinity River Division of the Central Valley Project and its operations. TRRP partners, through their individual mandates and authorizations, as well as through joint efforts funded by the TRRP, are active in mitigation on the mainstem and joint activities in the watershed that are mitigating for legacy mining, logging, and road building degradation.

The restoration approaches both in the mainstem and in the tributaries are well documented. To provide the commenter with additional background on the restoration techniques which the program is implementing, we recommend the following book and article:

Wissmar, R. C. and P. A. Bisson, editor. 2003. Strategies for restoring river ecosystems: sources of variability and uncertainty in natural and managed system. American Fisheries Society, Bethesda, Maryland.

Palmer, M., J. D. Allan, J. Meyer, E. S. Bernhardt. 2007. River Restoration in the Twenty-First Century: Data and Experiential Knowledge to Inform Future Efforts. Restoration Ecology. Volume 15(3):472-481.

For additional information on the current TRRP designs and review, refer to response to comment 23.B.

Comment 20.H – Change direction to restore watersheds.

The TRRP will continue to support vital watershed restoration work as recommended but will also continue to implement the Trinity River ROD as directed by the Secretary of the Interior.

Refer to response to comment 23.A.3 for a review of the Program's watershed restoration activities. Refer to response to comment 23.K.1 for information regarding a potential break in mainstem channel rehabilitation site construction.

Comment Letter 21

January 6, 2014

Matt St. John, Executive Director
North Coast Regional Water
Quality Control Board
5550 Skyline Blvd. Suite A
Santa Rosa, CA 95403-1072

Michelle Gallagher
Trinity River Restoration Program
P.O. Box 1300
Weaverville, CA 96093

Dear Mr. St. John and Ms. Gallagher:

I am writing this letter to express my concerns regarding further main channel rehabilitation in the Trinity River.

It is my understanding that the Trinity River Restoration Program is responsible for mitigating the water quality in the river during the construction of mainstem projects. Last summer on the days of August 14-15th I launched my boat at Dutton Creek at 9:30 in the morning. The water conditions could best be described as buff to mocha coffee in color. We were not able to row out of the poor water conditions until we reached a spot referred to the "Fawn Hole". This is located approximately 3/4 to one mile below the launch site at Dutton Creek. Needless to say, the water conditions on these two days ruined the fishing in this section of the river.

A

I would like to add commentary on water conditions during the summer of the Lowden Project. We live in the Poker Bar Valley in the summer months and fish Poker Bar Hole on a regular basis. On numerous mornings during the construction of the Lowden Project, the river was muddied in front of our home through the fishing location at Poker Bar Hole. This occurred on numerous occasions between the hours of 9-11 a.m. and would reoccur at times in mid to late afternoon.

B

Based upon the aforementioned observations, the Trinity River Restoration Program should cease mainstem projects until they can develop a viable plan that prevents water turbidity leading to unfishable conditions below in river projects.

C

Sincerely,



Clark Tuthill
810 Reo Lane
Poker Bar
Douglas City, CA



Response to Comment Letter 21

This comment letter contains 3 distinct comments (A-C). Following are the responses to those comments.

Comment 21.A. – Turbidity downstream on August 14-15, 2013.

During construction of all channel rehabilitation projects, TRRP contractors strictly adhere to permit conditions specified in the Program’s general water quality certification order number R1-2010-0028. This permit limits allowable turbidity levels at 500 feet downstream of the work zone to be measured at 20 nephelometric turbidity units (NTUs). Compared to usually crystal clear Trinity River water clarity, turbidity levels between 10 and 20 NTUs could appear “mocha in color” as the commenter noted. The permitted turbidity requirements are detailed in the water quality section of Appendix A in the Draft Bucktail and Lower Junction EA/IS (NCRWQCB et al. 2013b), in the water quality section of the Master EIR (Section 4.5), and in Table 23.M (Potential Impacts and Mitigation Identified in Comment 23.M).

During the August 14-15, 2013 period, the contractor was finishing construction of the in-channel meander (IC-7) and island (IC-6) downstream of the Douglas City (Highway 299 Bridge; Figure 21.A.1). The excavated material at IC-7 was the siltiest found in the entire 2013 project and required the contractor to slow excavation to stay within permit conditions. What is more, on August 13 a pulse of water between 500 and approximately 800 cfs was released from Lewiston dam for about 16 hours between 8 am and midnight. This relatively high flow release, shown in Figure 21.A.2 (at the Douglas City gauge), may have disturbed newly wetted areas the length of the river upstream of the construction site as well as at the newly excavated and silty IC-7. Both may have contributed to the overall turbid conditions seen by the commenter at that time. While Dutton Creek turbidity, stated by the commenter, was more noticeable than under “normal construction” conditions, the project activities were conducted within permit levels. Operations within these levels are considered protective of the Trinity River fishery.

Turbidity generally does not cause acute adverse effects to aquatic organisms unless concentrations are extremely high (Lloyd 1985). Short-term increases in turbidity levels that occur during permitted restoration activities are generally not considered to be biologically detrimental to aquatic organisms; they are short in duration and fish are able to move away from the activity area. The effects of turbidity on fish are described in the water quality section of the Master EIR (NCRWQCB and USBR 2009).

Comment 21.B. – Turbidity during the summer of the Lowden Project.

Comment noted. In summer 2010, the contractor constructing the Lowden channel rehabilitation site adhered to the same permit conditions as noted in comment 21.A.(general water quality certification order number R1-2010-0028). Because background Trinity River turbidity levels typically range between 0 and 1 NTU in summer, and permit conditions temporarily allow up to 20 NTUs at 500 feet downstream of excavation while restoration activities are being conducted, water clarity may have appeared cloudy downstream during excavation.

Comment 21.C. – Turbidity leading to unfishable conditions should cease.

The TRRP acknowledges that construction activities may affect the clear conditions that typically contribute to good fishing and that nominal increases in turbidity may affect the recreational experiences of anglers. However, river access to other areas, where construction is not occurring, is always available during TRRP project implementation.

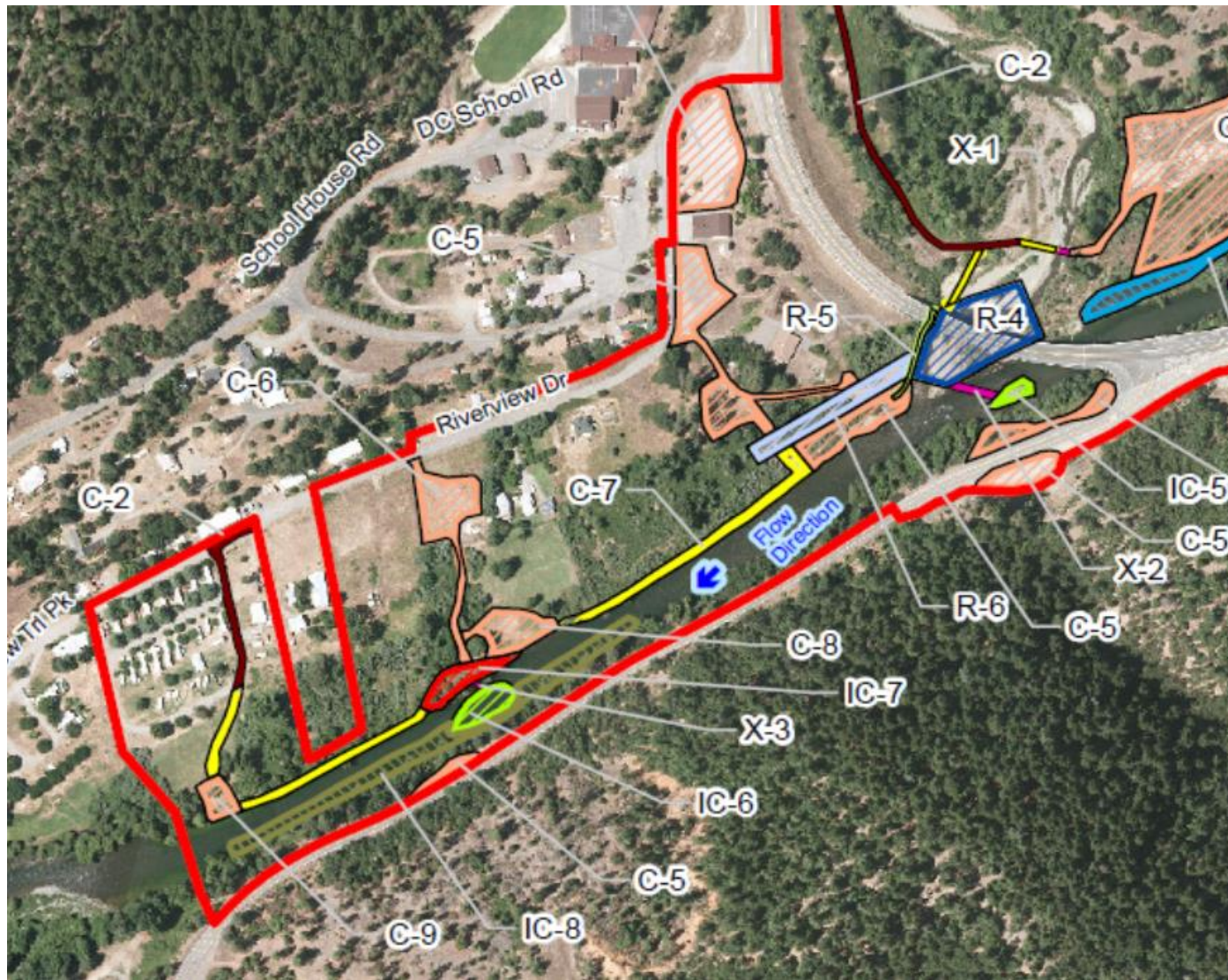


Figure 21.A.1. Shows the TRRP contractor work area during August 14-15, 2013 high turbidity readings. Excavated areas at IC-7 were a silty sediment that clouded the water and required slowed construction to meet permit requirements under “normal” base flow conditions.

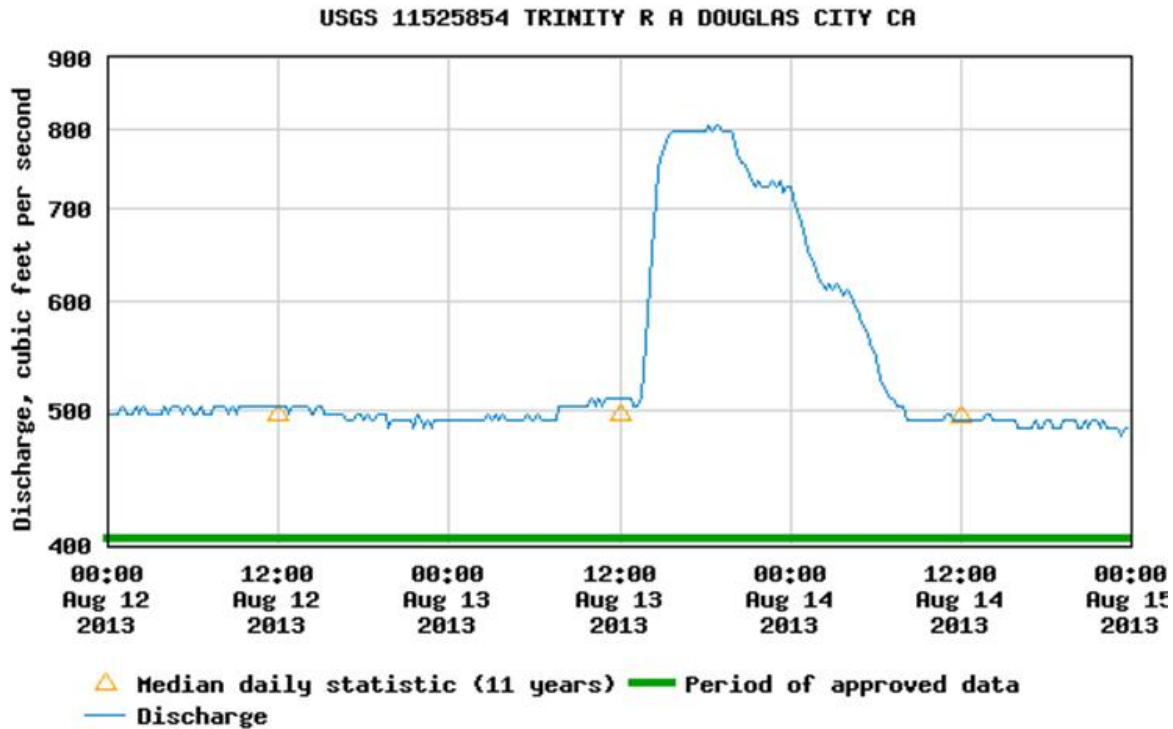


Figure 21.A.2. Displays river discharge measured at the Douglas City gauge from August 12 to August 15 (plotted from USGS gauge 11525854 at Douglas City; http://waterdata.usgs.gov/ca/nwis/uv?site_no=11525854).

Due to the nature of the proposed river restoration activities and the clarity of the Trinity River during low flow conditions, the Regional Water Board determined that an allowable zone of turbidity dilution is appropriate and necessary in order for Trinity River restoration activities to be accomplished in a meaningful, timely, and cost-effective manner that fully protects beneficial uses without resulting in a violation of the water quality objective for turbidity. Consequently, the Regional Water Board worked with TRRP to develop the water quality mitigation measures that are included in the TRRP's general permit (Order Number R1-2010-0028) and that are followed on TRRP projects today. These mitigation measures are considered workable to allow construction of river restoration projects but conservative enough to protect beneficial uses (NCRWQCB and USBR 2009).

For additional information on potential impacts to recreational that may occur as a result of implementation of the Bucktail and Lower Junction City Projects, refer to the recreation section (section 3.8) of the Draft Bucktail and Lower Junction City EA/IS and the recreation section (Section 4.8) of the Master EIR.

Refer to response to comment 23.Q for additional information on turbidity.