

# **APPENDIX A**

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## **Comments and Responses to Comments on the Draft EA/IS**

# Appendix A

## Comments and Responses to Comments on the Draft EA/IS

### Introduction

This appendix contains comments received by the Trinity River Restoration Program (TRRP) on the Draft EA/IS for the Trinity River Channel Rehabilitation Site: Bucktail (River Mile 105.45–107.0) Environmental Assessment/Initial Study and the TRRP's responses to those comments.

### List of Commenters

Table A-1 identifies local property owners and representatives of agencies and organizations who submitted comments on the draft EA/IS:

**Table A-1. Commenters on Draft EA/IS**

Commenter	Individual or Signatory	Agency/Affiliation	Date Prepared	Date Received
1	Al Lilleberg	Local property owner	N/A	December 25, 2015
2	Concerned Citizen of Trinity County (Anonymous)	Unknown	December 15, 2015	December 22, 2015
3*	Brad Henderson	California Department of Fish and Wildlife	December 24, 2015	December 24, 2015
4	Dave Hillemeier	Yurok Tribe	December 8, 2015	January 4, 2015

Note: Responsible and trustee agencies under CEQA are noted with **bold** text.

\*Letter of support. No response required.

### Comments and Responses to Comments

The four letters commenting on the draft EA/IS are reproduced on the following pages. Immediately following each of the comment letters are the responses to each letter. No response is provided to the letter written by the California Department of Fish and Wildlife because the letter expressed support for the project and does not require a reply.

To assist in referencing comments and responses, each commenter has been assigned a number and each specific comment a letter of the alphabet. Responses are coded to correspond to the codes used in the margin of the comment letters. Comments that present opinions about the project or that raise issues not directly related to the substance of the draft EA/IS are noted without a detailed response. None of the comments require changes to the EA/IS.

Commentary on the presentation given at the Moose Lodge during late Nov or early December of 1015

Al Lilleberg, long time observer of the “Buck Tail” area previously referred to as the “Big Rock” and ‘Gravel pit” and no doubt previously had another name for the area as there had been a high bridge extending from the big Rock to the two steel towers on the N side.

My parents bought 10 acres from the Gooding family back in 1953 or 2. I think the idea was to introduce country living to me, but they aren't here now to ask for certain. I feel qualified to tell about the region because I was observing from outside the local social view. The neighborhood I roamed in on weekends, summer stays, spring breaks, extended from the Salt Flats and Indian “village”, including their cemetery, down stream to just below Grass Valley Creek. from the mountain tops on each side.

Not only was I there physically through out the last 62 years, the neighborhood served as my undergraduate Biology/ecology laboratory and my graduate Earth sciences laboratory. It is safe to say that I have examined the neighborhood in detail. I was shocked at the changes wrought by the dam. When I realized the river was dead, I quit a life long hobby of fishing.

#### FISH

Your report on plans for restoring the fisheries and to address most aspects of anadromous populations. But there are other fish present! Resident rainbow trout and sun perch to name the most common. In those days I have no counts, but I do have an observation that cannot be seen in anywhere near the numbers that used to be present.

In the late afternoons of June, July and August a little preceding the retiring of the swallows and the appearance of the bats When looking down river across an expanse of about 400 feet of water surface, you could see fish jumping at insects. All sizes of fish from about 2 inches to about 16 inches were jumping at a rate that was uncountable. Single syllable numbers could keep up, but larger syllable numbers just fall hopelessly behind. This display would continue until dark. / Now that description supports high numbers of vertebrates feeding on insects. A very high majority of these insects were aquatic insects. This brings to question of what we are

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b

## LETTER 1

b      doing to increase the numbers of aquatic insects?

### AQUATIC PLANTS & INSECTS

c      Well, you are providing some feather edging and some point bars where the resulting shallow waters provide a foothold for filamentous algae and lesser size algae. The algae are the basis of the aquatic food chain. / This warm water region supports the entire aquatic system. It is not just

d      Shallow warm water. In early afternoon the shallows were painfully hot! We used to step quickly through the 0 to 3 inches of water because of the physical discomfort. / I remember turning rocks over in that environment by the light of a colman lantern. We were collecting Aquatic insect larvae to use as bait. The rocks were not cemented into position, but were loosely resting on others with lots of space beneath. Each space beneath such rocks was occupied by numbers of aquatic animal life from nematodes insect larva, gastropods, mollusks crayfish , pollywogs, etc.

Today, there are almost no such cobbles providing shelter.

Cementing of the bottom occurred during the dam construction when the Trinity ran paper bag brown for three months because of some unforeseen tunneling problem. Visibility in the region was less than 2 inches most of the time. Subsequent annual floods only moved sediments in some locations. Gone are the days of feeling/hearing the bedrock vibrate up to a half mile on either side of the river during exceptional winter rains.

### CRUSTACEANS & MOLLUSKS

e      Walking the river edge a person commonly saw Crayfish claws or pieces and river clam shells. In a hundred feet of riverbank, you could easily find evidence of something preying on the crayfish . and the river clam. Now, you see no sign of crayfish at all! In fact, I took one of my high school students on a search for crayfish on the trinity. He was doing a term paper on Calif. crayfish at my high school in Napa. This was in the 80s. It took us 4 hours to find two crayfish!

f      Today, occasionally you will find a clam shell after searching a half mile of riverbank. Who was feeding on these? I notice the Killdeer are found in much lower numbers than in the 50s or 60s. Now the river clam is still filter feeding on the river bottom. They exist in larger numbers than before the dam project! Nobody is preying on them!

## LETTER 1

### PACIFIC LAMPREY &

The numbers of pacific lamprey and the river suckers are down, like as not its a cemented bottom that is limiting the spawning opportunities. I am not sure.

g

### SUN PERCH & SUCKERS

These species have all but disappeared from the river system. I have some suspicions, but am unsure. The sun perch may have disappeared because the shallow annual ponds are gone. The suckers, I do not know enough about them. Sun perch used to abound in the dredge ponds adjacent to Gold Bar died out due to a change in the salt drainage from salt flat. But that isn't the main problem with their survival in the river. I have personally seen them in deep pools of the river, but you have to know how to look for them.

h

It looks to me that your project is going to help restore the damage done to the river by the dam project. I am of the opinion that vacuum dredging on the river would increase fish habitat immensely at no cost to local agencies while increasing economic gains for the community as a whole. / The valley does not rumble at high water anymore, and habitat for the natural food chain suffers as a result.

i

j

I much appreciate the efforts you are making to restore the river ecology. / Thank You for the opportunity to speak.

k

## **Response to Comment Letter 1**

Comment letter 1 contains 12 distinct comments and remarks made at the TRRP's December 2<sup>nd</sup> public meeting in Lewiston, California, where the existing conditions and Proposed Project were described. The following is a summary of the comments and responses to the comments in Letter 1:

### **Comment 1a. – Inclusion of native aquatic species in addition to salmonids.**

Section 1.5 of the Draft EA/IS provides a comprehensive discussion of the TRRP's intent to implement the 2000 ROD in order to increase habitat for all life stages of naturally produced anadromous fish native to the Trinity River. A key element of the proposed project is to create habitat for native anadromous fish while ensuring that habitat complexity and quantity increase as the alluvial processes of the Trinity River are enhanced or restored. These processes also maintain and/or enhance habitat for other native aquatic and riparian-dependent species that use the Trinity River and adjacent riparian habitat.

Section 1.6 of the Draft EA/IS provides a comprehensive discussion, using the best available information, of the fishery resources that are known to occur in the Trinity River downstream of Lewiston Dam. Although occurrences of native rainbow trout are well documented in the Trinity River, it is unclear which species the commenter refers to as "sun perch." Information on non-native warm water fish species (e.g., *Lepomis cyanellus* – Green Sunfish) is limited with respect to distribution and abundance.

### **Comment 1b. Affects on aquatic insect populations.**

The 2014 review by the TRRP's independent Scientific Advisory Board (Buffington et al. 2014) states that one of the objectives of the channel rehabilitation projects is to increase and maintain macroinvertebrate populations. The commenter supports the TRRP's interest in ensuring that program actions continue to maintain and/or increase a diverse assemblage of aquatic insects that are available as prey to both fish and vertebrate species. Like salmonids, many of these insect species rely on functional alluvial habitat. As improvements to alluvial and riparian habitat occur, it is expected that the associated insect populations will persist or increase.

### **Comment 1c. Creation of shallow water habitat that affects water quality.**

Trinity River water temperature in the Bucktail area is largely controlled by cold water releases from Lewiston dam. Water from the dam maintains 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 upstream of the confluence with the North Fork Trinity River to determine compliance with the following State Water Resources Control Board Order:

*WR 90-5 (SWRCB 1990).* This order set temperature targets to protect holding salmon. Reclamation constantly monitors temperature to ensure compliance with the summer (July 1 – September 15) regulatory target of 60°F at Douglas City, California. This temperature target is rarely exceeded during normal and wet years; in 2015 (dry water year) this temperature target was exceeded 11 of the 55 days monitored. However, the maximum temperature recorded during this monitoring period was 61.2°F. Based on TRRP monitoring efforts to-date, 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 the growth rates of fish and amphibians growth. The growth rates of fish 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 salmon that hold in the river in the fall waiting to spawn do require consistently cold temperatures but growing juvenile salmon and steelhead prefer warmer temperatures than those preferred by adults. Furthermore, yellow legged frog and western pond turtle prefer even warmer temperatures than young salmon; therefore, cold but spatially variable temperatures rather than uniformly cold conditions are desired downstream of Lewiston dam.

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, making some areas 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.

#### **Comment 1d. Historic changes in substrate composition.**

The ROD directs the TRRP to implement a gravel augmentation program in the reaches below the dam. The original 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' gravel augmentation activities (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.

This strategy was used to develop the objectives of the proposed designs described in Chapter 2 of the Draft EA/IS. These objectives are to:

- Increase fry and juvenile salmonid rearing habitat;
- Increase or maintain adult salmonid holding habitat;
- Increase adult salmonid spawning habitat;
- Increase and enhance wildlife habitat;
- Increase and enhance riparian and wetland habitat, and enhance upland habitats;
- Increase channel complexity;
- Promote fluvial processes;
- Minimize adverse impacts to existing infrastructure; and
- Minimize uncertainty related to project performance.

A number of these objectives are intended to enhance the development of functional, high-quality aquatic habitat with variability in the size and abundance of alluvial material (e.g., sand, gravel, cobble). For the Bucktail project area, actions within various activity areas are proposed to develop or enhance attributes necessary to maximize aquatic habitat for juvenile salmonids (e.g., suitable depth, velocity, cover, and substrate) consistent with the flow regime established under the 2000 ROD. In addition, the proposed project also includes placement of boulders and large wood structures to provide additional hydraulic and habitat complexity under various flows.

**Comment 1e & 1f. Crustacean and mollusk populations in the Trinity River.**

Populations of crayfish (e.g., signal crayfish *Pacifastacus leniusculus*) and mollusks (e.g., western pearlshell [*Margaritifera falcata*]) that use alluvial habitat in the Trinity River have been affected by changes in the flow and sediment regimes. The TRRP acknowledges the commenter's personal observations of diminishing crustacean and mussel populations at specific locations along the Trinity River; however, little quantitative data exist on these species. Recent surveys for western pearlshell mussels have located widespread mussels but the health of their population needs further study (B. Gutermuth, personal communication).

The TRRP's channel rehabilitation projects involve more than just providing immediate alluvial habitat gains for juvenile salmonids and other aquatic organisms. They also create a floodplain and channel geometry that flow and sediment regimes can interact with, and one that will maintain a diversity of hydraulic conditions that perform naturally. The suite of TRRP activities is intended to work together to restore the natural processes most affected by the upstream dams—those that are critical to sustain salmonid populations and other aquatic organisms during their riverine life stages.

While the TRRP has not performed specific studies of these species, ongoing monitoring continues to document the ecological benefits of TRRP actions to alluvial habitat and aquatic organisms, including managed flow releases, channel rehabilitation efforts, and sediment management projects.

**Comment 1g & 1h. Habitat for lamprey and other non-salmonid fish species.**

Native non-salmonid species that inhabit the Trinity River basin include Pacific lamprey (*Entosphenous tridentatus*) and Klamath smallscale sucker (*Catostomus rimiculus*). The abundance of resident native species and the factors affecting their abundance within the basin are not well understood; however, all these species evolved and existed in the Trinity River prior to construction of Trinity and Lewiston dams and are presumably adapted to those conditions. Pacific lamprey are also known to occur in the Trinity River downstream of Lewiston Dam in each of its freshwater life stages (i.e., adult, embryo, larval ammocete, metamorphosed and emigrating juveniles). In addition to using habitat in the Trinity River and its tributaries, the Hamilton Ponds, a series of sediment retention ponds at the confluence of Grass Valley Creek and the Trinity River, are also known to support lamprey ammocetes.

The 2009 Master EIR – EA/EIR acknowledged that potential impacts and benefits to lamprey populations would be similar to those previously described for salmon and steelhead. Adult lampreys migrate upstream to spawn from spring through early summer and again in the fall. The removal of riparian vegetation that contributes to shaded riparian area habitat within the boundaries of various channel rehabilitation sites could have a temporary impact on adult lamprey by reducing holding and hiding habitat, which is particularly important for upstream migrant adults. However, the



implementation of TRRP's riparian vegetation management plan is expected to alleviate this impact over the longer term and, in fact, improve alluvial habitat for lamprey and other non-salmonid fish species.

In addition to the Hamilton Ponds, additional off-channel aquatic habitat occurs as ponds associated with historic dredging operations. Depending on the hydrology and related water quality, these ponds do provide habitat for a diverse assemblage of native aquatic organisms. In some instances, the TRRP has worked with land owners and/or land managers to change the form and function of these features consistent with relevant plans and policies. For instance, BLM's Resource Management Plan has specific management direction to manage public lands to support viable populations of native organisms. Hydrology in some ponds on public lands has been modified to exclude habitat for bull frogs, an invasive, non-native species considered detrimental to native frog and turtle populations.

#### **Comment 1i. Suction dredging as a tool for channel restoration.**

Restoring the spawning and adult holding habitat lost due to sand accumulation was the major focus of the early restoration efforts in the 1970s and 1980s. Pool dredging was one of the primary management actions used to control sand accumulation in the Trinity River. Pool dredging using suction dredges, excavators, and draglines was conducted between 1976 and 1991. (Krause, A.F. 2012. History of Mechanical Sediment Augmentation and Extraction on the Trinity River, California, 1912–2011. Technical Report TR-TRRP-2012-2 (Revised). Bureau of Reclamation, Trinity River Restoration Program, Weaverville, California.) During the same time frame, Reclamation realized that the input of fine sediment from highly erosive granitic watersheds was occurring at much higher rates than could be removed efficiently with dredging/excavation techniques. Consequently, a multi-agency effort was initiated to restore the Grass Valley Creek watershed in order to reduce the amount of fine sediment delivered to the Trinity River.

The flow evaluation study and subsequent authorization of the TRRP, including implementation of flow regimes intended to mobilize and transport fine sediment were determined to be a more efficient approach to rehabilitation of the Trinity River. 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). Although suction dredging was used prior to authorization of restoration flows, the post-ROD flow regime is now the preferred method by the TRRP to manage fine sediment in a more natural way.

#### **Comment 1j. – Changes in Flow Regime and Relationship to Aquatic Productivity**

The Trinity River Flow Evaluation Report (USFWS and HVT 1999) specifically noted the decrease in Trinity River rearing habitat at flows of between approximately 300 and 2,000 cfs as a limiting factor for anadromous salmonids. These effects of these flow conditions are not evaluated or reported in the SAB Draft Phase I review report. This habitat bottleneck between 300 and 2,000 cfs, which is a result of the degraded "U-shaped" Trinity River channel, necessitates the need for mechanical channel rehabilitation as part of the strategy to restore the riverine habitats and eventually the fishery resources of the Trinity River. Another component of the TRRP is to restore, within physical infrastructure and private property constraints, the flows and coarse sediment required to reestablish the fluvial processes that will create and maintain riverine habitats. Because there has been only one extremely wet water year since the Program began mechanical channel rehabilitation, there has been

limited ability to study the benefits of high flows at the project sites. The only maximum restoration flow of 11,000 cfs occurred in 2011, after the Phase I activities had been completed.

Channel rehabilitation projects involve more than just providing immediate rearing habitat gains for juvenile salmonids. They also create a floodplain and channel geometry that flow and sediment regimes can interact with, and one that will maintain a diversity of hydraulic and ecologic conditions that are designed to perform naturally. The suite of TRRP activities are intended to work together to restore the natural processes most affected by the upstream dams—processes that are critical to sustain salmonid populations and other aquatic organisms during their riverine life stages.

**Comment 1k. Appreciation of restoration efforts.**

Thank you for your support.

Concerned Citizen of Trinity County

December 15, 2016

Brandt Gutermuth  
Environmental Scientist  
Trinity River Restoration Program  
PO Box 1300, 1313 S. Main ST.  
Weaverville CA 96093

RE: Bucktail Restoration

Dear Mr Gutermuth,

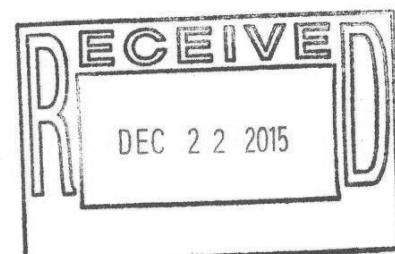
I attended the public meeting at the Moose Lodge in Lewiston on December 2, 2016. After listening to the presentation, I do not have concern over the scope of the Bucktail restoration project. However, I have serious concern over the Bucktail Bridge. I understand that funding was not secured for a new bridge. That is what it is. However I do not like how the Bureau of Reclamation is hedging its bet with the project design and implementation with the current bridge in place. I understand that your models predict that the bridge will be okay, but those are models and not reality.

What I would like your team to address is creating a deeper channel downstream of the bridge to accommodate debris load at high flows. I would like to see at deepening of at least 4 to 6 feet in the channel for at least 1/4mile downstream.

Please do not use your models to gamble with our bridges and infrastructure.

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## **Response to Comment Letter 2**

This comment letter contains two distinct comments. Following are the responses to those comments.

### **Comment 2-a. Modeled data vs. mapped data.**

Modeling is a well-recognized and widely used scientific approach. As the commenter notes, modeling used for the proposed project indicates that the form and function of upstream rehabilitation activities would not affect the Bucktail Bridge.

Within the general confines of the project area, the design engineers use models to inform themselves of the potential effects that changes in site topography could have on existing and constructed features and how those elements function under variable flow conditions. The designers also use these models to assess the potential impacts on features that exist both upstream and downstream of the project (e.g., Bucktail Bridge) using model parameters such as water depths, velocities, and sheer stresses under both pre- and post-construction conditions and how the results might affect long-term maintenance/evolution of the features. These modeling results are also being used to ensure that TRRP projects comply with the requirements of Trinity County's Floodplain Ordinance so that there would be no increase in the elevation of the 100-year flood.

Results of empirical observations (e.g., monitoring) are being used to select optimal configurations for maximum aquatic habitat quality for juvenile salmonids (e.g., depth, velocity, and proximity to cover) in as-built conditions and as conditions evolve (e.g., erode, aggrade, or vegetate) under envisioned ROD flow conditions.

### **Comment 2-b. – Restoration Site Downstream of Bucktail Bridge**

The environmental study limits for the proposed Bucktail Project do not extend downstream of the existing Bucktail Bridge. The project as proposed is intended to restore the form and function of alluvial features at a number of activity areas. The Proposed Project will function with the current bridge and will not affect the structure. The hydraulic modeling results used by the design team have documented that the proposed rehabilitation activities would comply with the requirements of Trinity County's Floodplain Ordinance with respect to the current conveyance capacity of the Bucktail Bridge for both high flows and debris loads.

Accommodating passage of debris through a channel reach can be addressed by engineers in the design plan using different methods and features. If a deeper channel is determined by the TRRP to be an objective for the reach downstream of the Bucktail Bridge, this could be accomplished by constructing various features at some future time that would create complexity and roughness, allowing the river itself to do the work of scouring the channel.

The TRRP acknowledges that fundamental changes in the flow regime, coupled with site-specific channel rehabilitation and sediment management actions, will result in changes to areas throughout the 40-mile restoration reach. Reestablishing high flows, reducing riparian berms, increasing channel complexity, and adding roughness, in conjunction with the existing hydraulic controls within the river (e.g., Bucktail Rock) provide opportunities for the river to re-adjust itself. These types of readjustments can lead to changes in how sediment is scoured, stored, and transported over time.

The specific site that the commenter has identified—the ¼-mile reach downstream of Bucktail Bridge—is not one of the specific sites identified in the 2000 ROD and is beyond the scope of the current Bucktail project.



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Region 1 – Northern  
601 Locust Street  
Redding, CA 96001  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

EDMUND G. BROWN JR., Governor  
CHARLTON H. BONHAM, Director



December 24, 2015

Mr. Gil Falcone  
North Coast Regional Water Quality Control Board  
3330 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403

**Subject: Review of the Trinity River Channel Rehabilitation Sites: Bucktail  
Project Initial Study, Trinity County**

Dear Mr. Falcone:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Project Initial Study, State Clearinghouse Number 2015112039 (Project). The Project is located on the Trinity River near the Bucktail Bridge and extends approximately 1.5 miles upstream. Proposed work consists of similar activities already implemented throughout the restoration reach of the Trinity River. The Department supports ongoing habitat improvement projects associated with the Trinity River Restoration Program and has no additional comment at this time.

If you have any questions, please contact me at 530-225-2362 or by email at [Brad.Henderson@wildlife.ca.gov](mailto:Brad.Henderson@wildlife.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Brad H.", followed by a horizontal line.

Brad Henderson  
Senior Environmental Scientist

cc: Mr. Brandt Gutermuth, TRRP  
[bgutermuth@usbr.gov](mailto:bgutermuth@usbr.gov)

State Clearinghouse  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Michael R. Harris and Amy Henderson  
California Department of Fish and Wildlife  
[Michael.R.Harris@wildlife.ca.gov](mailto:Michael.R.Harris@wildlife.ca.gov) and [Amy.Henderson@wildlife.ca.gov](mailto:Amy.Henderson@wildlife.ca.gov)

*Conserving California's Wildlife Since 1870*

### **Response to Comment Letter 3 – Acknowledgement of Support**

Thank you for your support.



# YUROK TRIBE

190 Klamath Boulevard • Post Office Box 1027 • Klamath, CA 95548  
Phone: (707) 482-1350 • Fax: (707) 482-1377

December 8, 2015

To:

Brandt Gutermuth  
Trinity River Restoration Program  
P.O. Box 1300  
Weaverville, CA 96093

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

I submit these technical comments on behalf of the Yurok Tribe in response to the recent request for public comment on the Environmental Assessment for the Bucktail channel rehabilitation project. The Yurok Reservation is located on the lower 44 miles of the Klamath River, from near the confluence of the Trinity and Klamath Rivers downstream to where the river joins the ocean. Restoration of the Trinity River is of utmost importance to the Yurok People, as the fishery resource is integral to the Yurok way of life for cultural, subsistence, and economic purposes. The Yurok Tribe is the single largest harvester of Klamath River fish populations, including those from the Trinity River, the largest tributary to the Klamath.

During recent decades, the Yurok Tribe has put substantial effort into restoring the Trinity River, to address the impacts of the Trinity and Lewiston Dams upon fish habitat and associated populations. Following the signing of the Trinity River Record of Decision (ROD) in 2000, full implementation of the Trinity River Restoration Project was delayed due to legal challenges; these legal issues were not resolved until 2004, resulting in full implementation being delayed until 2005. Completion of the channel rehabilitation projects has extended far beyond the original estimate of 6 years, further delaying the restored fisheries promised by the ROD.

The Yurok Tribe supports construction of the Bucktail project as it will significantly improve the amount and quality of salmonid habitat. Specific comments on the Environmental Assessment include:

1. The entire project should be built in 2016. TRRP has considered phasing construction across multiple years. Doing so imposes additional expense (e.g. multiple mobilization costs) and additional public inconvenience. A multi-year construction also further delays the important fisheries benefits.
2. The project benefits significantly outweigh the sedimentation risk at IC-7 imposed by the existing Bucktail Bridge during a 100-year flow event. The project should be built with or without the proposed bridge replacement. Trinity County and TRRP should continue to seek funding for the proposed bridge replacement.

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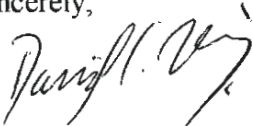
c



## LETTER 4

- |   |                          |                                                                                                                                                                                                                                              |
|---|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| d | <input type="checkbox"/> | 3. Use construction phasing and other techniques to maximize safe public access of site during construction. For example, consider constructing R-5 first and using it as a temporary boat launch while the rest of the site is constructed. |
| e | <input type="checkbox"/> | 4. BLM should purchase the in-holding of private land                                                                                                                                                                                        |
| f | <input type="checkbox"/> | 5. the cover page photo is confusing because it shows a completely different project site. Change the cover photo to be Bucktail specific.                                                                                                   |

Sincerely,



Dave Hillemeier, Fisheries Director

## **Response to Comment Letter 4**

This comment letter contains six distinct comments. Following are the responses to those comments.

### **Comment 4-a. – Acknowledgement of Support.**

Thank you for your support.

### **Comment 4-b. – Project Implementation Schedule.**

The TRRP acknowledges the importance of completing the project in the shortest amount of time possible while still addressing all federal, state, and local requirements. The tentative construction schedule for the proposed project is described in section 2.4.4.3. As indicated, construction of the Proposed Project is scheduled to take place in 2016 if funding is available.

### **Comment 4c. – Effects of Existing Bucktail Bridge on the project.**

The TRRP acknowledges the importance of evaluating the effects of the exiting Bucktail Bridge on the proposed action. Bucktail Bridge was identified as a design constraint in the EA/IS (section 1.3.1.1). While replacement of the current bridge is under consideration, bridge replacement at this location is not considered a connected action; it is, however, considered in the discussion of cumulative effects in the EA/IS. The TRRP will continue to coordinate with Trinity County to explore funding opportunities to replace the existing Bucktail Bridge, but any decision on the proposed action will not depend on future decisions related to a bridge replacement project.

### **Comment 4d. –Safe Public Access**

The TRRP acknowledges the commenter's suggestion. Recognizing the importance of ensuring temporary public access (e.g., a boat launch) throughout the construction season, the TRRP will take into consideration the recommendation of constructing activity area R-5 early in the construction process while ensuring that in-channel activities have a limited operating period (July 15 to September 15).

### **Comment 4e. – Acquisition of private land by BLM.**

Prior to construction, formal realty agreements would be made between Reclamation, land managers for BLM and Trinity County, and private landowners whose property would be affected. These agreements would clarify the terms and conditions under which Reclamation would work on private property. In addition, these agreements would compensate landowners, based on fair market value of identified temporary access and construction agreements, and would hold property owners harmless during construction activities. Figure 2 in the EA/IS illustrates the location of public and private lands within the ESL for the project.

Any actions related to BLM's land acquisition or disposal program are not associated with the proposed project and are excluded from consideration in the NEPA/CEQA process. According to the Federal Land Policy and Management Act (FLPMA), the Redding RMP, and BLM policy, the BLM must work with willing sellers and is limited to offering the appraised market value to purchase lands.

**Comment 4f. – Replacement of Cover Photograph**

The TRRP acknowledges the request to replace the cover photograph with an image that is specific to the Bucktail project. The cover has been replaced.