APPENDIX E

Wild and Scenic River, Section 7 Analysis and Determination

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Bucktail Rehabilitation Project Wild and Scenic River, Section 7 Analysis and Determination

INTRODUCTION

The Trinity River was designated as a National Wild and Scenic River (WSR) in 1981 under the Federal Wild and Scenic Rivers Act (WSRA). In addition to the mainstem Trinity River from the confluence with the Klamath River to 100 yards below Lewiston Dam, three other sections of the river were designated: the North Fork from the Trinity River confluence to the southern boundary of the Trinity Alps Wilderness Area, the South Fork from the Trinity River confluence to the California State Highway 36 bridge crossing, and the New River from the Trinity River confluence to the Trinity Alps Wilderness Area.

These sections of the Trinity River were designated as Wild and Scenic to preserve the river's freeflowing condition, water quality, and the Outstandingly Remarkable Values (ORVs) identified on the date of designation: the anadromous and resident fisheries, outstanding geologic resource values, scenic values, recreational values, and cultural and historic values. The section of the Trinity River identified for the Bucktail Rehabilitation Project was found to have outstandingly remarkable values (ORV's), due to it's anadromous fishery. Under an interagency agreement between the National Park Service, the Bureau of Land Management (BLM), and the U.S. Forest Service, the BLM generally has the responsibility for conducting WSRA Section 7 determinations for the mainstem Trinity River from Lewiston Dam to the confluence with the North Fork Trinity River. After the designation, BLM classified the mainstem Trinity River as a Recreational River from 100 yards below Lewiston Dam downstream to Cedar Flat.

The proponent for the Proposed Project (Bucktail Rehabilitation Site: River Mile 105.45–107.0) is the Bureau of Reclamation, Trinity River Restoration Program (TRRP). Because a portion of the proposed activity would occur on lands it manages, BLM serves as a co-lead federal agency along with the TRRP for the environmental assessment (EA) portion of the integrated NEPA/CEQA document (EA/IS) prepared for this project. This analysis and subsequent determination evaluates the effects of the proposed activity on the Trinity River's free-flowing condition, water quality, and the ORVs and ensures their protection as required under Section 7 of the WSRA. Because of the length and level of detail provided in the EA/IS, this WSR analysis is presented in summary form and refers the reader to the specific sections of Chapters 2, 3, and 4 of the EA/IS for additional information on water quality, fisheries, wildlife, flora and fauna, recreational, and aesthetic values.

Existing conditions at the Bucktail site are a result of previous rehabilitation activities at the site in 2009, as well as a variety of natural and management disturbance mechanisms that have occurred at this site over the past 75 years. The channelization of the Trinity River associated with historic dredge

activities was exacerbated by the modifications to the flow regime of the Trinity River downstream of Lewiston Dam beginning in 1964, when the Trinity River Division (TRD) of the Central Valley Project (CVP) became fully operational. At the date of designation, the riparian berms that were essentially channelizing the river at a number of locations had been developing for more than 15 years, and scientists recognized that the alluvial nature of the river had been modified extensively due to changes in the flow regime and sediment flux. Although changes in the flow regime since 2005 have provided some opportunity to modify the form and function of the river, the Record of Decision (ROD) for the Trinity River Mainstem Fishery Restoration Environmental Impact Statement/Environmental Impact Report (Department of Interior, 2000) required establishment of the TRRP and stipulated that mechanical channel rehabilitation, including management of sediment input (reduction in fine sediments (sand) and augmentation of coarse sediment (gravel), would be required to reconfigure sections of the river and provide opportunities for alluvial processes to become reestablished, albeit at a smaller scale than had occurred prior to the construction and operation of TRD facilities (e.g., Lewiston Dam) in 1964.

SECTION 7 ANALYSIS

Section 7(a) of the WSRA provides that water resource projects upstream or downstream of a WSR may occur as long as the project "will not invade the area, unreasonably diminish or have a direct adverse affect on the scenic, recreational, fish and wildlife values present in the area as of the date of designation." This section also requires river-administering agency (i.e., BLM) to determine whether the proposed water resource project is consistent with its river-resource protection requirements. This determination evaluates the effects of proposed activities that involve construction below the ordinary high water mark within the WSR corridor on the river's free-flowing condition, water quality, and scenic, recreational, fish and wildlife values. This analysis and determination follows the Evaluation Procedure provided to Reclamation by BLM's Redding Field Office for the Klamath Facilities Removal Project prepared by the BLM, Forest Service and National Park Service in 2012.

The conditions that were present on the Trinity River when it was designated and included in the National System constitute the basis for evaluating the Proposed Project as described in the EA/IS. Therefore, the baseline conditions for the Trinity WSR are those present in 1981.

The initial question to be addressed in this WSR Section 7(a) determination is whether the Proposed Project described in the EA/IS invades or directly adversely affects the designated reach of the Trinity River; defined as encroachment or intrusion upon.

The next question to be answered, relative to the standard set forth in the WSRA, Section 7 and Section 7(a) is whether the proposed action will "unreasonably diminish or directly adversely affects" the scenic, recreational fish or wildlife values of the designated river. This standard implies that it's acceptable to diminish or effect one or more of these values to some degree, therefore two additional questions must be considered:

- 1. Does the proposed action evaluated in the EA/IS cause the scenic, recreational, fish or wildlife values to be diminished or directly adversely affect relative to the date of designation?
- 2. If one or more value is diminished or directly adversely affected, is it unreasonable?

Definition of the Proposed Project

The overarching purpose of the TRRP is to restore fish populations to pre-dam levels and restore dependent fisheries, including those held in trust by the federal government for the Hoopa Valley Tribe (HVT) and the Yurok Tribe (YT). The fundamental purpose of the proposed activity is to enhance the fishery and other values provided by the Trinity River in the general vicinity of the Bucktail site by implementing the rehabilitation activities illustrated on Figure 3 in Chapter 2 of the EA/IS. Specifically, the Proposed Project would recreate complex salmon and steelhead habitat, enhance natural river processes for the benefit of wildlife, and provide conditions suitable for reestablishing native riparian vegetation. The Proposed Project was one of the original 43 projects listed in the 2000 ROD to restore the fish resources of the Trinity River. In 2009, the TRRP implemented a Phase 1 project that included a portion of the current Bucktail site as part of the Lewiston/Dark Gulch Channel Rehabilitation Project. The current Proposed Project for the Bucktail site is intended to enhance previous channel rehabilitation efforts and also to incorporate new activities that would enhance channel complexity and refugia habitat (e.g., large wood) that have emerged as important rehabilitation components as a result of the TRRP's ongoing monitoring efforts.

As part of the TRRP's Phase 2 channel rehabilitation efforts, the Proposed Project is one of about 12 channel rehabilitation projects that the TRRP expects to implement in the next 10 years. These Phase 2 projects are in addition to the ongoing flow/sediment management and watershed restoration elements of the TRRP.

Implementation of the Proposed Project will incorporate environmental commitments and project design features to ensure that it is consistent with the management goals and objectives established by BLM for the Trinity River under its Redding Resource Management Plan, specifically to support management actions intended to enhance the fishery and recreational ORVs of the Trinity River.

The Proposed Project was developed through a cooperative effort by the TRRP, BLM, and the HVT. It is intended to improve the conveyance of flows by reestablishing the alluvial attributes of the Trinity River, namely floodplains and side channels, while decreasing the potential for channel constriction by modifying floodplain widths and elevations.

The project proponents, the purpose and need for the project, and the geographic location of the proposed activity are described in Chapter 1 of the EA/IS. Specific information on the duration of the proposed activities and their magnitude and extent is provided in Chapter 2 of the EA/IS. Chapter 4 describes the relationship to past and future management activities with an emphasis on cumulative effects.

Does the Proposed Action Diminish or Directly Adversely Affect WSR Values?

The following criteria were applied to evaluate potential for diminishment or direct adverse effects of the Trinity WSR. This Determination evaluates potential project effects upon four WSR values; scenery, recreation, fish and wildlife. The criteria presented below were also applied to evaluate effects upon these values within the Trinity WSR.

Scenery Value Evaluation Criteria

Scenery was evaluated using the following criteria:

- Water flow character (river flows and accompanying geomorphic character)
- Water Appearance (clarity, turbidity, color)
- Fish and wildlife viewing
- Riparian vegetation
- Natural appearing landscape character (visual effects of facilities and structures as viewed from the designated WSR corridor)

Recreation Value Evaluation Criteria

Recreation was evaluated using the following criteria:

- Whitewater boating
- Recreational fishing
- Other recreational activities (birding, swimming, camping)
- Recreational setting (water quality related aesthetics and public health and safety aspects)

Fisheries Value Evaluation Criteria

Fishery was evaluated using the following criteria:

- Stream flow regime
- Water temperature
- Water quality (physical, biological and chemical)
- Aquatic habitat (geomorphic condition, sediment transport regime and substrate quality)
- Fish species population conditions, specifically:
 - Anadromous salmonid fish species
 - Resident fish species
 - Species traditionally used and culturally important to Native Americans

Wildlife Value Evaluation Criteria

Wildlife was evaluated using the following criteria:

• Changes in habitat for affected species

Trinity Wild and Scenic River Evaluation

Scenery Value

Scenery was not identified as an ORV; however it is included in this evaluation consistent with the requirements of Section 7 of the WSRA. This evaluation focuses on river's unique landform, diverse vegetation, water and lack of negative cultural modification.

Water Flow Character: Implementation of the proposed action (channel rehabilitation activities) is intended to restore the form and function of the treated reach to provide ability to convey flow, sediment and large wood in a manner similar to how the river functioned prior to construction of the TRD. The result would be to restore a more historic and natural

appearing flows, increase the amount and diversity or riparian vegetation, and thereby improve scenic quality.

- Water Appearance: Implementation of the Proposed Project (channel rehabilitation activities) would result in short-term effects anticipated during project implementation, associated with: the removal of riparian and upland vegetation and excavation and placement of alluvial materials within and adjacent to the active channel/floodplain; grading activities within and adjacent to the wetted channel; placement of coarse sediment to enhance spawning habitat; construction of side-channel habitat; and placement of large wood and/or boulder clusters to increase habitat complexity. In-channel construction actions would result in short-term increases in turbidity as well as a potential for short-term decreases in juvenile rearing habitat as a result of excavation and placement of alluvial materials. Consistent with the conditions of the General Permit issued to the TRRP by the North Coast Regional Water Quality Control Board (Water Board), mitigation and turbidity monitoring measures will be implemented to ensure that the overall appearance of the Trinity River will not be affected.
- Fish Viewing: Short-term impairment to fish viewing in the WSR would result from localized increases in turbidity during the in-channel work window (July 15-September 15). However, in the long-term, the proposed project would increase the overall population of native fish and other aquatic organisms. This would increase the overall number of salmonids and other native fish species that may be viewed.
- Wildlife Viewing: Improvements in riparian and upland habitat is a fundamental element of the purpose and need for the proposed project. Expansion of floodplain habitat and extensive revegetation efforts are key activities at a number of locations throughout the project area. Rehabilitation of large, barren dredge tailings would include both grading and revegetation intended to reestablish and enhance upland habitat for a wide array of wildlife species. Increases in populations of fish and other aquatic organisms (mussels, turtles, frogs) would provide increased forage for riparian and riverine wildlife species that depend on these organisms as a prey base. Therefore, wildlife viewing opportunities would increase.
- Riparian Vegetation: The proposed project would change the gradient of the river, expand the floodplain and remove the monoculture of willows that became established as a result of long-term flow reductions after Lewiston Dam became operational. The proposed project would result in a more natural looking channel and facilitate establishment of a complex and diverse assemblage of riparian vegetation typical of free flowing alluvial rivers.
- Natural Appearing Landscape Character: Implementation of the proposed action (channel rehabilitation activities) would result in reshaping the bed and banks of the affected reach in a manner that reestablishes the alluvial process that occurred prior to historic large-scale dredging activities and that were subsequently impeded by modification of the flow and sediment regimes in the years following completion of the TRD. This project would result in a more natural setting ad character within and adjacent to the project area.

Conclusion

There would be short-term negative impacts to scenery due to project activities (e.g., clearing, grading, in-channel construction) and water appearance (localized turbidity increases). However, the long-term beneficial effects of the proposed action would enhance scenery of the Trinity WSR.

Recreation Value Evaluation

Recreation was not identified as an ORV; however it is included in this evaluation consistent with the requirements of Section 7 of the WSRA. This evaluation focuses on whitewater boating opportunities, fishing for anadromous salmonids and other recreational uses.

- Whitewater Boating: Since the 2005 ROD flows were implemented during the period from April to August, whitewater boating on the Trinity River has increased substantially, particularly during wetter water years. The reach of the river associated with the Proposed Project is primarily alluvial in nature and there is little whitewater in the first 10 miles below Lewiston Dam. The primary boating activity is by rafters during the summer, although during fishing season, this section of the river is also used drift boats. The Proposed Project would result in a short-term reduction in access to BLM's Bucktail Boat Ramp during construction; anticipated to be several weeks during the summer. In-channel construction would occur in a manner that ensures that visitor use and public safety are not affected. Alternative locations are available upstream at the Lewiston Bridge and Rush Creek boat launch sites. Impacts on whitewater boating would be limited to short-term affects at site-specific locations within the project area.
- Recreational Fishing: The fundamental objective for the Proposed Project is to restore the form and function of the Trinity River to enhance the fishery; specifically for anadromous salmonids. While there would be short-term impacts on recreational fishing within and adjacent to the project area due to construction closures. Public access will be available to most of the Bucktail site during project implementation. Consistent with the long-term goals of the TRRP, improvements in the flow and sediment regimes, coupled with channel rehabilitation efforts would increase fish populations. Therefore, recreational fishing would improve.
- Other Recreational Uses: During implementation of the Proposed Project, and for a period of time after grading is completed and revegetation activities are being implemented, short-term erosional processes could result in an increase in turbidity. These brief changes to water quality could have some impacts to other recreational uses (e.g., wildlife viewing, hiking) in the immediate vicinity of the Bucktail site.

Conclusion

There would be short-term, negative impacts on water quality that could impair recreational beneficial uses. The short-term restriction of the Bucktail Boat Ramp, limitations on fishing access and changes in the appearance of the Trinity River at this location will not substantially limit recreational uses.

Fishery Value Evaluation

Fish are an ORV in the Trinity River. The river supports a number of native and non-native fish and other aquatic organisms. Prior to the installation of the TRD, the river provided habitat for numerous anadromous fish species, including Chinook salmon, Coho salmon, steelhead trout and Pacific lamprey. A fundamental objective of the TRRP is restoration and enhancement of the Trinity River fishery.

Although it is generally recognized that the alluvial features existed on the date of designation, the transitory nature of riverine environments precludes the ability to fully quantify these features. The extensive body of scientific evidence available for the Trinity River suggests that the riparian berms and floodplain features had extensive riparian communities that were well established on the date of designation.

- Stream Flow Regime: The modification of the flow regime beginning in 1964 has provided the conditions for establishing a monoculture of riparian vegetation on the riparian berms on either side of the Trinity River and essentially channeling flows and inhibiting floodplain function during higher flows. The interaction between vegetation and fine sediment continued to expand this condition, although large floods (e.g., 1997) modified this riparian community to some degree. In addition to modifying the riparian vegetation, the riparian berm inhibited access of flows to the floodplain (1.5-year return interval) and subsequently affected the amount and types of vegetation on the floodplain. Since 2005, the flow regime of the Trinity River has been managed in accordance with the 2000 ROD to improve riparian and floodplain conditions in conjunction with channel rehabilitation projects like those proposed at the Bucktail site. Since 2005, the TRRP has made substantial changes to the flows in a manner that rehabilitates and enhances the Trinity River fishery.
- Water Temperature: Prior to full implementation of the ROD in 2005, up to 90 percent of the natural Trinity River flow was diverted to the Sacramento River basin through facilities associated with the TRD. Beginning in 1964, water quality in the Trinity River, particularly its temperature and sediment regimes were substantially altered. The influence of Trinity Lake and Lewiston Reservoir on downstream conditions diminishes with distance. In general, the greater the release volumes from Lewiston Dam, the less susceptible the river's temperature is to other factors. Releases from the TRD are generally cold (42 to 47 degrees Fahrenheit [°F]). These temperatures are transmitted through Lewiston Reservoir to the Trinity River below Lewiston Dam. Although the Proposed Project would remove riparian vegetation, this action is not expected to have a negative impact on water temperatures in the river.
- Water Quality: In 1992, the Environmental Protection Agency (EPA) added the Trinity River to its list of impaired rivers under the provisions of Section 303(d) of the CWA in response to a determination by the State of California that the water quality standards for the river were not being met due to excessive sediment. In 2001, the EPA established a Total Maximum Daily Load for sediment in the river. The Regional Water Board has continued to identify the Trinity River as impaired in subsequent listing cycles. The primary adverse impacts associated with excessive sediment in the Trinity River pertain to degradation of habitat for

anadromous salmonids. The restriction of streamflows downstream of the TRD has greatly contributed to the impairment of the Trinity River below Lewiston Dam (EPA 2001). With implementation of ROD flows and placement of coarse sediment in the Lewiston area, local reductions in fine sediment in the river bed have been observed and fish spawning has increased. Recent measurements to compare in-channel fine sediment concentrations, preand post-ROD flows, have indicated that gravel quality and river bed oxygen permeability have increased through the 40-mile reach.

- Aquatic Habitat: The Trinity River Flow Evaluation Final Report (USFWS and HVT 1999) determined that lack of spawning and rearing habitat for juvenile salmonids is likely a primary factor limiting the recovery of salmonid populations in the Trinity River. Activities at the Proposed Project site are specifically designed to increase the abundance of habitat for Trinity River salmonids by reconnecting the river with its floodplain, increasing channel sinuosity, and providing shallow low velocity habitats in close proximity to the river's edge. The Proposed Project is designed to restore the alluvial processes of the Trinity River within the 1.55-mile reach associated with the Bucktail site. As described in Chapter 2 of the EA/IS, more than 7 acres of riparian and/or floodplain habitat would be enhanced and/or improved as a result of the Proposed Project.
- Fish Species Population Conditions: Flows in the Trinity River downstream from Trinity and Lewiston Dams have been regulated since Trinity Dam closed in 1960. Diversion of up to 90 percent of the Trinity streamflow to the Sacramento River basin in the 1960s and 1970s led to substantial geomorphic change in many locations along the river, with the predominant responses being channel narrowing and vegetative encroachment along the channel margins. Concurrently, reductions in salmonid populations in the Trinity River resulted in congressional action to restore the Trinity River and its fishery. Activities included in the Proposed Project are intended to have beneficial effects on fisheries within the project area, and these benefits are expected to increase over time. In-channel activities would:
 - increase channel complexity and shallow low velocity refuge at a variety of flows and would provide up to 90,000 square feet of fry and juvenile rearing habitat that meets criteria for depth, velocity, and with the placement of habitat structures;
 - construct riffles that would provide adult salmonid spawning areas and increases food resources (benthic macroinvertebrates) for fry and juvenile salmonids during critical winter and spring rearing periods;
 - provide slow water refuge within a constructed alcove to provide fry and juvenile habitat at flows ranging between 300 cfs and 4,500 cfs; and
 - increase channel sinuosity and channel complexity, providing fry and juvenile rearing opportunities at a wide range of flows over existing conditions.

Conclusion

Although there would be short-term effects on riparian and floodplain habitat as a result of construction-related actions (e.g., clearing, grading, in-river excavation), the long-term effects on the fishery values of the Trinity River are expected to be positive and substantial.

Wildlife Value Evaluation

Wildlife habitat within the project area includes riparian and upland habitat. Habitat that typically occurs below the ordinary high water mark (6,000 cfs) of the Trinity River is characterized as riparian. Habitat that occurs above this elevation is considered upland habitat. The riparian corridor adjacent to the Trinity River provides habitat for a wide array of special-status plants and wildlife species. A full discussion of riparian-dependent species is provided in Chapter 3 of the EA/IS.

- Riparian Habitat: The Proposed Project would convert almost seven acres of non-riparian areas (e.g., tailings, terrace deposits) to riparian habitat, including wetlands within a three-five year post project time frame. A revegetation program will be incorporated into the proposed activity and will emphasize reestablishing native species and increasing the diversity of vegetation throughout the project area. As described in Chapter 2 of the EA/IS, there are a number of environmental commitments to address a diverse array of riparian dependent species. These include pre-construction surveys and avoidance measures to protect nesting birds; relocation of amphibian species if encountered; and use of construction monitors to identify and avoid impacts to fully protected species (e.g., ringtailed cats).
- . Upland Habitat: Most of the upland habitat that occurs within the project area has been subject to wide array of modification as a result various types of human disturbances. In addition to large-scale bucket-line dredge activity that occurred in and adjacent to the Trinity River between 1930 and 1950, more recent mining for sand and gravel has severely altered the landscape within and adjacent to the project area. To a lesser degree, residential development and recreational uses have also had effects on upland habitat. The Proposed Project would involve removing material (primarily fine-textured sediments) from the riparian berm and floodplain and placing this material on dredge tailings in the immediate area upslope of the 100-year floodplain. These tailing deposits are remnants of the bucketline dredge activity that occurred at the many locations along the Trinity River. These features are long, linear piles of sand, gravel, cobbles, and boulders that are piled on the floodplains and terrace features adjacent to the present channel of the river and are essentially devoid of vegetation. Placement of excavated material on the dredge tailings would provide an opportunity to enhance more than 10 acres of upland habitat by reestablishing native upland plant communities while reducing the area occupied by non-native vegetation, thereby making the tailings more productive in terms of vegetation and wildlife species. A revegetation program will be incorporated into the proposed activity and will emphasize reestablishing native species and increasing the diversity of vegetation throughout the project area.

Conclusion

Short-term and localized negative effects to wildlife species and their respective habitats due to the Proposed Project are expected. However, long-term improvements to riparian and upland habitat and increased wildlife forage opportunities resulting from this project, in conjunction with other TRRP actions would have long-term beneficial effects.

SECTION 7 DETERMINATION

The evaluations presented in the previous section provide the basis for the determination to be made in this document. This determination will be made by the Redding Field Manager, Jennifer Mata. The next question relative to standard in Section 7(a) of the WSRA, is whether the Proposed Project will "unreasonably diminish or directly adversely effect" the scenic, recreational fish or wildlife values of the designated river. Given that the standard implies some diminishment or direct adverse effects of values may be acceptable, there are two questions to consider.

- 1. Does the Proposed Project evaluated in the EA/IS prepared for the Bucktail project cause diminution or adverse effects of the scenic, recreational, fish or wildlife values of the Trinity River as present at the date of designation?
- 2. If there is diminution or adverse effects, are they unreasonable? This would suggest an evaluation of the magnitude of the loss. Factors to be considered include: (1) whether the values contributed to the designation of the river (i.e., outstandingly remarkable); and (2) the current conditions and trends of the resource, (if diminution is determined unreasonable, measures may be recommended to reduce adverse effects to acceptable levels).

The information provided in the EA/IS, in conjunction with the project record has been fully considered in arriving at the following conclusions. A tabular summary of these conclusions is provided in Table 1.

WSR Segment Designation	Invade the WSR	Unreasonable Diminishment of WSR Values			
		Scenery Value	Recreation Value	Fishery Value	Wildlife Value
Trinity River Recreational	Yes	Enhanced (rehabilitates river reach to a condition that is improved from the date of designation)	Whitewater Boating (No Change) Fishing and other Recreation Enhanced	Enhanced	Enhanced

Table 1.	Invade and Unreasonably Diminish Conclusions – Proposed Project at the Bucktail
	Site

The short-term effects of the Proposed Project, with the inclusion of environmental commitments and project design features would be short-term in nature (1-2 years as areas subject to clearing and grading within and adjacent to the Trinity River stabilize and become revegetated. The referenced commitments include a number of specific measures to protect native salmonids and other aquatic

and riparian dependent species. Measures to protect upland wildlife species are also included as part of the Proposed Project.

In the long-term, the Proposed Project, in conjunction with other actions undertaken by the TRRP to rehabilitate and enhance habitat for anadromous salmonids and other aquatic and upland species will result in overall improvement to the scenery, recreation, fish and wildlife values in the Trinity WSR.

I have carefully considered the short-term closure of the Bucktail Boat Ramp and limitations on public access to public lands within the project area required during construction activities. This recreational site would not be eliminated; rather the boat ramp facilities would be upgraded as part of the Proposed Project, including relocation of facilities to elevations above the ordinary high water mark to reduce impacts during high flow events. The overarching purpose and need for the Proposed Project is to improve the Trinity River fishery, thereby meeting the goals of the TRRP with respect to tribal trust resources and recreational fishing opportunities. Fishing opportunities for tribal members and recreational user would increase due to increase in the spawning and rearing habitat for anadromous salmonids and other aquatic and riparian dependent species.

The Proposed Project would result in long-term benefits to the scenery, recreation, fish and wildlife values present when the Trinity WSR was designated as a National W&SR in 1981. Since there would be no "direct adverse effects" of the Trinity WSR or "unreasonable diminishment" of its values, I find the Proposed Project as described in Chapter 2 of the EA/IS to be fully consistent with the protections afforded by the WSRA.

Jennifer Mata Redding Field Manager Bureau of Land Management

5/12/16

Date