

Finding of No Significant Impact

Trails Management Plan and Environmental Assessment

**US Department of the Interior
National Park Service
Whiskeytown National Recreation Area
Whiskeytown, California
March 2022**

Introduction

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service (NPS) to select the preferred alternative in the Trails Management Plan at Whiskeytown National Recreation Area (WHIS). This alternative was evaluated against a No-Action Alternative and the two considerations were analyzed in the EA. This FONSI documents the NPS determination that no significant impacts to the quality of the human environment will occur from the construction of the proposed trail system.

Alternatives Considered in the Environmental Assessment

The June 2021 EA described two alternatives:

- Alternative 1: No-action (p. 9)
- Alternative 2: Action Alternative (Selected Action and Environmentally Preferable Alternative, p. 15)

No-Action Alternative

The No-Action Alternative will not be selected. The No-Action Alternative describes current management of the trail system carried into the future. This alternative represents current conditions and is also a baseline for comparison of the action alternative (preferred alternative). Under the No-Action Alternative, the management direction established in the 1999 General Management Plan (GMP) would continue. Current management activities occurring on and relating to the 66-mile trail network would also continue. No new trails would be constructed. Because of the Carr Fire, temporary closures and minor improvements would continue under the No-Action Alternative to provide safe trail experiences. Minor repairs and improvements would be initiated with the goal of upgrading existing trails to meet NPS sustainability standards. As safety issues arise, existing trails would be restored to natural conditions or rerouted on a case-by-case basis. No social trails would be closed for resource preservation. No trails would be rerouted for improving resource conditions or visitor experiences. The park has identified \$1.3 million dollars of deferred maintenance on existing trails that would be completed under a separate NEPA pathway. Mountain biking would continue to be allowed within the park, with the Oak Bottom Water Ditch Trail and Brandy Creek Falls Trail continuing to be the most frequently used trails by cyclists.

Selected Alternative

The action alternative will provide enhanced experiences within the WHIS trail system. Under the action alternative (NPS preferred alternative), 79.4 miles (approximately 13.4 additional miles compared to the no action) of total trail will be included in the trail system. All trails will be constructed with a mixture of hand tools, hoisting equipment, chainsaws and motorized equipment, depending on the location, slope and extent of work involved. Motorized equipment may include but are not limited to mini bulldozer, mini excavators, and other related equipment.

Trail Classes:

This alternative uses the established trail classes as defined in the No-Action Alternative. Trail Classes assigned to new trails are included in Table 2 of the EA.

Trail Construction:

This alternative proposes approximately 32.2 miles of trail construction that includes new trails and rerouted sections of existing trail.

New Trails:

The longest trail, the proposed lakefront trail, will be about 8 miles in length and designed to improve access to the lake. The Whiskeytown Lake Trail will be a multiuse asphalt trail intended for bicycle and pedestrian use. It is likely that the lakefront trail will be established in sections and funded by multiple sources.

This alternative will also establish a new trail along the Shasta Divide at the east side of the park. This trail, covering about 7 miles in the eastern portion of the park, will provide visitors with views of Mount Shasta and the Lassen Peak. The trail will be designed to connect with the adjacent BLM trail network at Mule Mountain where mountain biking occurs, enhancing the visitor use experience of bicyclists.

The new trails are designed to connect existing trails for more trail loops, create new visitor experiences in different parts of the park, and increase opportunities for diverse visitor uses. New trails proposed are described by trail class, trail use, and mileage in Table 2 of the EA. New trails include reroutes of unsustainable trails and are noted in the "Reroute" column. Included in the calculation of new trails is the formalization of social trails. A total of three social or informally visitor-created trails totaling one mile are included within the summation of new trails.

Finally, the park would like to pursue the establishment of a water-based trail in the future. A water-based trail with National Water Trail designation will require additional research, consultation, coordination and civic engagement. A water trail will be considered under a separate effort and, if applicable, will tier off this trails plan.

Trail Reroutes:

A total of seven rerouted trails totaling 11.7 miles are also proposed. All of the proposed trail reroutes will accompany a closed section of trail that has been determined to be unsustainable due to erosive soils or soil compaction, steep alignment, and undesirable visitor experiences. In total, the action alternative will close approximately 15.3 miles of unsustainable trail. Out of these 15.3 miles of trail, 11.7 miles of trail are being rerouted to more sustainable alignment and use.

Trails Restored to Natural Condition:

In total, 3.6 miles of trail will be closed without a reroute. A mixture of hand tools and motorized equipment will be used to return the trails to natural conditions.

Environmentally Preferable Alternative

The Council on Environmental Quality's National Environmental Policy Act (CEQ NEPA) regulations and the National Park Service NEPA guidelines require that "the alternative or alternatives which were considered to be environmentally preferable" be identified. The CEQ defines "environmentally preferable" as "the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources." The environmentally preferable alternative is based on an evaluation of the alternative using the criteria identified in Section 101 of NEPA stated below:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
- Achieve a balance between populations and resource use which will permit high standards of living and a wide sharing of life's amenities; and
- Enhance the quality of renewable resources and approach maximum attainable recycling of depletable resources.

The NPS determined that the Action Alternative, the Selected Action, is the environmentally preferable alternative.

Public Involvement (p. 51)

In 2017, the public was asked to provide their thoughts on a proposed action. The planning team used these public comments to inform development of preliminary plan alternatives. Then in 2018, the Carr Fire burned 39,000 of the park's 42,000 acres, resulting in park staff diverting funding and staff time typically dedicated to trail maintenance to clearing hazard trees and stabilizing soils to keep trails safe, open and passable. The trails management plan was reinitiated and updated in 2020 to reflect the changed landscape and address the immediate need for long term solutions to poorly designed and/or unsustainable trails.

The EA was available for review for 30 days from June 8 to July 8, 2021. Emails announcing availability of the EA for review were sent to local tribes, elected officials, organizations, businesses, individuals, and federal, state, and local agencies. A press release was sent to the park media list, which includes local and regional newspapers, radio, and television stations. A virtual public meeting was held on Wednesday June 23, 2021, from 6:00pm PDT to 7:30pm PDT. The EA was open to the public for comment on the NPS Planning, Environment, and Public Comment (PEPC ID 71676) public site at

https://parkplanning.nps.gov/WHIS_Trails_Plan. There was media interest in this project resulting in published articles from multiple outlets. Given the extent of substantive comments and substantial number of modifications to the plan/EA, the NPS is issuing a revised EA that reflects updated trail mileages, additional best management practices, and minor updates based on bike policies.

Agency Consultation

Section 7 of the Endangered Species Act

United States Fish and Wildlife Service

A letter of technical assistance from the Yreka Fish and Wildlife Office (USFWS) was received by WHIS on July 8, 2021 in response to the consultation letter the park submitted to USFWS. To summarize, the findings are that none of the activities described in the Proposed Action will affect the northern spotted owl, or its critical habitat. For clarification, the USFWS stated that they do not have the regulatory or statutory authority to provide concurrence for “no effect” determinations due to policy and the implementing regulations for section 7 of the Endangered Species Act of 1973(Act), as amended (16 U.S.C 1531 et seq.). Therefore, the USFWS advised WHIS that any determination language in the EA, or other project documents, be updated accordingly to reflect a “no effect” determination and to consider USFWS review of WHIS consultation letter on the northern spotted owl and its critical habitat as a technical assistance under the Act.

National Marine Fisheries Service

A letter of insufficient information to initiate consultation from the National Marine Fisheries Service was received by WHIS on July 27, 2021 in response to the consultation letter the park submitted to NMFS. WHIS requested concurrence on the determination that the WHIS Trail Management Plan is not likely to adversely affect the Central Valley spring-run Chinook salmon and the California Central Valley steelhead. Unfortunately, the materials accompanying the consultation request did not provide all the information necessary to initiate informal consultation under the Endangered Species Act of 1973(Act) as described in the regulations governing interagency consultations (50 CFR §402).

On September 7, 2021 WHIS requested a technical assistance from NMFS on the needed information to move forward with informal consultation on the WHIS Trail Management Plan. To summarize, WHIS needed to show avoidance and minimization measures for the activities described in the Proposed Action that would not disturb or result in the direct injury or mortality of the Central Valley spring-run Chinook salmon, the California Central Valley steelhead, and their designated critical habitat. NMFS provided additional avoidance and minimization measures that would reduce impacts to listed species and designated critical habitat. The additional avoidance and minimization measures that will be included in the Proposed Actions are:

- Best Management Practices (BMPs) will be in place for the duration of the project to minimize or prevent sediment of other construction-related materials from entering the water. BMPs include installation of rock walls, rolling dips, slope breaks, silt fencing for any earthwork needed, erosion matting and wattles, and mulching to control exposed soil on slopes and ditches to limit sediment from reaching waterways. Any silt fencing or monofilament materials will be removed promptly at project completion. No plastic monofilament wattles will be used, only biodegradable materials.

- Installation of BMPs will occur only during dry periods. Prior to storm events, all construction activities shall cease and appropriate erosion control measures will be implemented. Prior to initiation of any waterside work, erosion control measures will be utilized throughout all phases of operation where silt and/or earthen fill threaten to enter waters of the U.S. and/ or state, limiting or preventing turbidity in the waterways of concern.
- New and rerouted trails will be installed at low grades and will be out-sloped.
- Removal of native vegetation adjacent to trails will be minimized, and removal of large trees will be avoided.
- Soil, silt, or other organic materials will not be placed, stockpiled, or stored where such materials could pass into surface water or surface water drainages during unexpected rain events.
- Hazardous materials will be stored in a location where there is no potential to enter any waterway or aquatic resource. All hazardous materials will be stored in secondary containment (e.g., by a prefabricated temporary containment mat, a temporary earthen berm, or other measure) and covered when rain is forecast or during wet weather.
- Any spills will be immediately contained and cleaned up (e.g., with absorbent materials or affected soil dug up and properly disposed of). If the spill occurs during rain, the impacted area will be covered to avoid runoff, and appropriate clean-up steps will be taken after precipitation has ceased. For spills of federal reportable quantities, the National Response Center will be notified.
- Refueling of vehicles and equipment will occur at least 100 feet away from waterways.
- Activities that increase erosion potential within the Lower Clear Creek watershed will be limited to May 1 to October 31, when the potential for rainfall events to transport sediment to surface waters is lowest.
- All work will cease among any trails near Clear Creek, and its tributaries during rain.
- No lights will be near Clear Creek, even for security purposes.
- Project work is expected to take up to 10 years due to funding, and the NPS will send NMFS a report on project progress and expectations every 5 years.
- NPS will stay aware of ESA species status and needs during the project length and will reinitiate consultation if any changes are made to ESA listed species in the action area.
- NPS is installing informative exhibits near Clear Creek about listed fish species.

In a letter dated November 17th, 2021 WHIS notified NMFS of the intent to re-consult under section 7 of the Act by providing additional information to move forward with informal consultation and request for concurrence for “may affect, not likely to adversely affect” determination for federally threatened Central Valley spring-run chinook and California Central Valley steelhead and their designated critical habitat. On a letter dated January 14th 2022, NMFS notified WHIS of their determination of not likely to adversely affect the subject listed species (Central Valley spring-run Chinook salmon and California Central Valley steelhead) and designated critical habitats.

Section 106 of the National Historic Preservation Act

In a letter dated May 15, 2017, the National Park Service notified the California Office of Historic Preservation (SHPO) of the intent to consult under section 106 of the National Historic Preservation Act regarding the preparation of a trail management plan for Whiskeytown National Recreation Area. After reviewing the information submitted, the SHPO agreed that the project as described constituted an undertaking with the potential to affect historic properties. The SHPO believed that the Area of Potential Effects was sufficient to take direct and indirect effects into account and asked that the list of other consulting parties and Tribal consultation efforts be included in the National Park Service's next submittal.

In a letter dated May 24, 2021, Whiskeytown submitted additional consultation that included a revised draft of the proposed trails management plan for SHPO review. Because each action proposed under the trails management plan would be subject to Section 106 compliance under the 2008 NPS Nationwide Programmatic Agreement or 36 CFR 800, the National Park Service proposed a Finding of No Adverse Effect. After reviewing the revised draft, the SHPO had no objection to the finding. The SHPO did note that under certain circumstances such as an unanticipated discovery or a change in project description, Whiskeytown may have future responsibilities for the undertaking under 36 CFR 800.

Native American Tribal Consultation

Whiskeytown National Recreation Area initiated tribal consultation for the trails management plan on November 6, 2017 by mailing letters to the Redding Rancheria and the Wintu Educational Council. No comments were received. More general consultation letters, that included information on the trails management plan, were sent in 2019 and 2020 (The trails management plan process was paused in 2018 due to various circumstances including the Carr Fire). In February of 2021, the park requested a record search from the Native American Heritage Commission (NAHC) Sacred Lands File (SLF). The record search was returned in a letter dated March 18, 2021 with positive results.

A meeting with Chairman Hayward of the Nor Rel Muk Wintu was held on November 12, 2020. Various park projects, including the trails management plan, were discussed and Chairman Hayward indicated interest in potential monitor for any projects within the Tower House Historic District and Tower House Archeological District, but otherwise supported the trails management plan with no immediate concerns expressed. Meetings with Redding Rancheria Chairman Potter followed on March 1, 2021 and June 7, 2021. Topics of discussion included a brief review of the trails management plan. Chairman Potter indicated generally for all national recreation area projects that he will not likely comment where no new ground disturbance occurred, but will potentially comment, provide feedback, or request a Tribal Monitor on projects where new ground disturbance may occur or in specific areas subject to concern. Park staff informed Chairman Potter that the trails management plan required regular consultation for individual actions as proposed to ensure compliance with Section 106 as well as to fulfill the park's responsibilities to consult with the Tribal Community.

Whiskeytown continued consultation on the revised draft of the trails management plan in a letter sent May 25, 2021 to tribal partners identified by the NAHC. The consultation included a copy of the draft trails management plan for review and comment. No comments were received.

Why the Selected Alternative will not have a Significant Effect on the Human Environment

Using the criteria defined in the Council on Environmental Quality's NEPA regulations (Section 1501.3(b)), the NPS has determined the Selected Alternative will not have significant adverse effects on the human environment. No major adverse impacts were identified for the Selected Alternative that will require analysis in an EIS. This section summarizes effects on resources in the context of the project area and the Park Complex as a whole, and documents that none of these effects are significant. The Selected Alternative neither establishes a precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.

Several issues were dismissed from detailed analysis in the EA (p. 4-7). Water quality was dismissed because removing and rerouting unsustainable trails in the preferred alternative will have beneficial effects on the park drainages' water quality by reducing soil erosion and turbidity. Vegetation was dismissed because new trail construction will disrupt less than 0.03% of the recreation area and mitigation measures will reduce the chance of spreading nonnative plant species during construction activities and the lifespan of the trails. Wildlife was dismissed because most trail improvements are proposed within previously disturbed areas and in areas with a high concentration of visitors and trail reroutes and revegetation along trails will improve wildlife habitat. Cultural Landscapes and Historic Districts were dismissed because the historic integrity and setting of the Tower House Historic and Archeological Districts will not be impacted and new trails will be designed to be compatible with the natural and historic surroundings in accordance with SHPO. Ethnographic resources were dismissed because the proposed new trails or reroutes under the preferred alternative will not impact known ethnographic resources or impede tribes' ability to utilize Whiskeytown for traditional purposes, and new and rerouted trails will avoid known ethnographic resources in consultation with tribes. Historic Structures was dismissed because the proposed new trails will not have a direct effect on the structures in the Tower House Historic District or other historic structures at the Whiskeytown Environmental School (WES). Environmental justice was dismissed because the proposed actions will not have disproportionately high and adverse human health or environmental effects on minority and low-income populations.

Most impact topics will have long-term beneficial effects with some adverse impacts that range from insignificant to unmeasurable. Many of the adverse impacts are construction related and will, therefore, be temporary and unnoticeable after completion of the project and once new vegetation becomes established. Longer term adverse impacts to vegetation and wildlife will be minor because they are small, localized effects. Adverse impacts to visitor use and experience, public health and safety, and socioeconomics range from minor adverse to moderate beneficial, with local businesses receiving more customers due to an increased workforce presence. These effects are not considered significant. A detailed analysis of effects can be found in the EA (p. 25-49)

Regarding construction impacts on visitor and resident experience, these impacts will be minimized by complying with existing laws and Mitigation Measures and Best Management Practices (p. 19-23). Upon implementation of these minimization measures, impacts to visitors and residents may lead to temporary inconveniences during construction, but will otherwise be minor for visitor and resident experience.

Effects on Human Health and Safety

Construction activities will ensure there is no disruption to essential services such as NPS firefighting, EMS response, and search and rescue operations. This will have beneficial health and safety effects. The Selected Alternative introduces a minor risk to human health and safety by constructing new and rerouted trails. Dust, noise, construction delays, and potential increased traffic will have temporary and minor effects on public health and safety. These effects will be partly mitigated by requiring the implementation of Mitigation Measures in construction activities. Closing and rerouting unsafe and unsustainable trails will have a positive impact on human health and safety. Creating new trails with sustainable alignment will affect public health and safety by increasing the safety of using the multiuse trails.

Effects that violate federal, state, tribal, or local law protecting the environment

Implementing the Selected Alternative will not cause effects that would violate federal, state, or local environmental protection laws.

Trends of Reasonably Foreseeable Planned Actions

To determine significance, this project's impacts were analyzed in conjunction with four other reasonably foreseeable planned actions identified in the Trails Management Plan. These projects were considered as part of the affected environment and have the potential for effects to overlap with the Selected Action, as follows:

Past and continuing maintenance of Western Area Power Administration (WAPA), Pacific Gas & Electric (PG&E), and California Department of Transportation (Caltrans) rights-of-way for roads and transmission lines and continuing construction and NPS maintenance of firebreaks for prescribed fires may continue to result in:

- varying levels of soil erosion and rights-of-way vegetation clearing and disturbance;
- varying levels of sediments being transported into Lower Clear Creek and other drainages;
- erosion impacts and social trailing, increasing potential impacts to archeological resources;
- erosion impacts to irrigation historic ditches;
- temporary increase in congestion on related roads and impacts to visitors' opportunities for solitude.

These potential impacts would add to existing adverse trends in erosive soil (p. 25). These impacts would negatively affect the existing stable trends in special status species, archeology, historic ditches, and visitor use and experience (p. 28, 35, 37, 38).

Conclusion

Based on the environmental impact analysis contained in the EA, the mitigation measures designed to avoid, reduce, or eliminate potential impacts, and the results of public review and agency coordination, the NPS has determined the Selected Alternative does not constitute a major federal action that would significantly affect the quality of the human environment. The Selected Alternative is not without precedent, nor is it similar to an action which normally requires an EIS. No connected actions with potential significant impacts were identified. Therefore, in accordance with the National Environmental Policy Act (1969) and regulations of the Council on Environmental Quality, requirements have been satisfied and preparation of an EIS is not required.

Recommended:

JOSH HOINES Digitally signed by JOSH HOINES
Date: 2022.03.09 12:14:16 -08'00'

Josh Hoines, Superintendent
Whiskeytown National Recreation Area
National Park Service

Date

Approved:

Frank W Lands **FRANK LANDS**
2022.03.11 08:01:47 -08'00'

Frank Lands, Regional Director
Regions 8, 9, 10, and 12
National Park Service

Date

Appendix A: Determination of Non-Impairment

The Prohibition on Impairment of Park Resources and Values

NPS Management Policies 2006, §1.4.4, explains the prohibition on impairment of park resources and values: “While Congress has given the Service management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the 1916 Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them. The impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by the legislation or by the proclamation establishing the park. The relevant legislation or proclamation must provide explicitly (not by implication or inference) for the activity, in terms that keep the Service from having the authority to manage the activity so as to avoid the impairment.”

What is Impairment?

NPS Management Policies 2006, §1.4.5, What Constitutes Impairment of Park Resources and Values, and §1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment.

“Impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values.” §1.4.5 of Management Policies 2006 states:

“An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park’s general management plan or other relevant NPS planning documents as being of significance.”

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated. An impact that may, but would not necessarily lead to impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park.” Per §1.4.6 of Management Policies 2006, park resources and values at risk for being impaired include:

- “the park’s scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells;

water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.”

Impairment Determination for the Selected Alternative

Based on the evaluation of potential impacts identified in the EA, the topics evaluated for impairment include the following:

Erosive Soils – Short-term effects on erosive soils will be reduced by implementing the Mitigation Measures which will ensure that the short-term impacts are recoverable. Long term effects on erosive soils will be positive as trail closures and reroutes to more sustainable alignment will result in revegetation and restoration of erosive soils. The overall impacts on erosive soils in the Selected Alternative will not cause impairment.

Special Status Species – The reduction in erosion and sediments, with the application of Mitigation Measures during the construction of new trails, will result in a beneficial impact on the federally threatened spring-run chinook salmon and Central Valley steelhead trout. Applying Mitigation Measures and BMPs listed in Chapter 2 will reduce impacts to Pacific fisher, northern spotted owl, bald eagle, and rare plant communities. The overall impacts to special status species and their habitat in the Selected Alternative will not cause impairment.

Archeology – New trail development will avoid direct impacts to archeological sites and impacts from increased visitor use in the Tower House Archeological District will be reduced, as outlined in the Mitigation Measures. Impacts to archeology in the Selected Alternative will not cause impairment.

Historic Ditches – Erosion to historic ditches from new trail development will be reduced through Mitigation Measures. Impacts to historic ditches in the Selected Alternative will not cause impairment.

Visitor Use and Experience – The increase of trail mileage and diversity of visitor opportunities will positively impact visitor use and experience. Visitor use management strategies for indicators, thresholds, and visitor capacity will help reduce crowding at popular areas and enhance visitors’ overall experience. Impacts to visitor use and experience in the Selected Alternative will not cause impairment.

Summary

As described above, adverse effects and environmental impacts anticipated as a result of implementing the Selected Alternative on a resource or value whose conservation is necessary to fulfill specific

purposes identified in the establishing legislation or proclamation of the park, key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or identified as significant in the park, general management plan, or other relevant NPS planning documents, will not rise to levels that will constitute impairment of park values and resources in Whiskeytown National Recreation Area.

Appendix B. Errata

This Errata contains corrections and minor revisions to the Environmental Assessment. Page numbers and section/sentence locations referenced pertain to the Public Review Draft EA from June 2021. The edits and corrections in this Errata do not result in any substantial modification being incorporated into the Selected Action, and it has been determined that the revisions do not require additional environmental analysis. The Errata when combined with the EA comprises the only amendments deemed necessary for the purposes completing compliance and documentation for the project. Existing text to remain in the Environmental Assessment is found in *italics*, additions to the text are underlined, and deleted text is shown in ~~strikeout~~.

Chapter 1, Page 2: *The current trail system is comprised of approximately 66.70 miles of trails, mostly located to the south, east, and west of Whiskeytown Lake*

Chapter 1, Page 5: Wildlife - *The construction and use of 32.28 miles of new trails by visitors would result in the loss of additional wildlife habitat and could potentially fragment some wildlife habitat and populations.*

Chapter 2, Page 10: *Current management activities occurring on and relating to the 66.70 mile trail network and 42.2 mile administrative road network would also continue.*

Chapter 2, Page 10: Trail Classes. *Table 1A shows a comprehensive list of all trails available in the existing trail network.*

Chapter 2, Page 11: Table 1A

Table 1A. Existing Trails, Trail Class, Trail Use, and Distance

Trail Name	Trail Class	Trail Use	Length (miles)
<i>Boulder Creek Falls Trail</i>	<i>2</i>	<i>Pedestrian Only</i>	<i>.1</i>
<i>Boulder Creek Trail (segment 1)</i>	<i>3</i>	<i>Multiuse</i>	<i>1</i>
<i>Boulder Creek Trail (segment 2)</i>	<i>4</i>	<i>Multiuse</i>	<i>2.8</i>
<i>Brandy Creek Falls Trail</i>	<i>4</i>	<i>Multiuse</i>	<i>1.5</i>
<i>Brandy Creek Picnic Trail</i>	<i>5</i>	<i>Multiuse</i>	<i>.3</i>
<i>Brandy Creek RV Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.17</i>
<i>Brandy Creek Trail</i>	<i>4</i>	<i>Multiuse</i>	<i>2</i>
<i>Buck Hollow Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1</i>
<i>Camden Water Ditch Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.1</i>
<i>Clear Creek Canal Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>4.8</i>
<i>Clear Creek Vista Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.8</i>
<i>Crystal Creek Falls Trail</i>	<i>5</i>	<i>Accessible, Multiuse</i>	<i>.5</i>
<i>Crystal Creek Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>2.3</i>

<i>Trail Name</i>	<i>Trail Class</i>	<i>Trail Use</i>	<i>Length (miles)</i>
<i>Crystal Creek Water Ditch Trail</i>	<i>4</i>	<i>Pedestrian Only</i>	<i>1</i>
<i>Davis Gulch Trail</i>	<i>4</i>	<i>Pedestrian Only</i>	<i>3.3</i>
<i>Guardian Rock Trail (segment 1)</i>	<i>3</i>	<i>Multiuse</i>	<i>.6</i>
<i>Guardian Rock Trail (segment 2)</i>	<i>5</i>	<i>Accessible, Multiuse</i>	<i>.4</i>
<i>Horsetail Canyon Trail</i>	<i>2</i>	<i>Multiuse, <u>WES Only</u></i>	<i>.6</i>
<i>Hydraulic Mine Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.5</i>
<i>James K. Carr Trail</i>	<i>4</i>	<i>Pedestrian Only, Multiuse</i>	<i>1.4</i>
<i>Kanaka Cutoff Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.1</i>
<i>Kanaka Peak Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>3.3</i>
<i>Knobcone Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.3</i>
<i>Ladybug Lane Trail</i>	<i>2</i>	<i>WES Only</i>	<i>.3</i>
<i>Logging Camp Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.25</i>
<i>Martha's Ditch Trail</i>	<i>3</i>	<i>WES Only</i>	<i>2.5</i>
<i>Mill Creek Trail (segment 1)</i>	<i>4</i>	<i>Multiuse</i>	<i>4.56</i>
<i>Mill Creek Trail (segment 2)</i>	<i>3</i>	<i>Multiuse</i>	<i>2.3</i>
<i>Mill Creek Trail (segment 1 & 3)</i>	<i>2</i>	<i>Multiuse</i>	<i>1.92</i>
<i>Mill Creek Trail (segment 2)</i>	<i>3</i>	<i>Multiuse</i>	<i>.2</i>
<i>Mount Shasta Mine Loop Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>3.9</i>
<i>Mule Mountain Loop Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.2</i>
<i>Mule Mountain Pass Trail</i>	<i>3</i>	<i>Multiuse</i>	<i><u>1.2</u> 4.25</i>
<i>Oak Bottom Water Ditch Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>2.8</i>
<i>Orofino Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.1</i>
<i>Papoose Connector Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.2</i>
<i>Papoose Pass Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>2.6</i>
<i>Peltier Bridge Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.5</i>
<i>Peltier Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.75</i>
<i>Princess Ditch Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.9</i>
<i>Prospect Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.4</i>
<i>Rich Gulch Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.8</i>
<i>Ridge Trail</i>	<i>3</i>	<i>WES Only</i>	<i>1.8</i>
<i>Salt Creek Mine Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.1</i>

<i>Trail Name</i>	<i>Trail Class</i>	<i>Trail Use</i>	<i>Length (miles)</i>
<i>Salt Creek Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1</i>
<i>Salt Gulch Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>1.6</i>
<i>Shasta Divide Nature Trail</i>	<i>3</i>	<i>Pedestrian Only Multiuse</i>	<i>.4</i>
<i>Tower Grave Trail</i>	<i>3</i>	<i>Multiuse</i>	<i>.2</i>
<i>WES Emergency Access Road</i>	<i>4</i>	<i>Multiuse</i>	<i>.6</i>
Total			66.70

Chapter 2, Page 13: *Use of E-Bikes: The superintendent of the national recreation area has authorized Class 1 and Class 2 e-bikes on all trails, public roads, and administrative roads within the NRA; (1) paved and unpaved roads and parking lots that are currently open to public vehicular traffic and (2) on administrative roads and trails. Class 2 and Class 3 e-bikes are allowed on all public roads, but not allowed on trails or administrative roads within the NRA prohibited because of the potential for exceeding 20 mph with motor-assisted power combined with their increased weight.*

Chapter 2, Page 14: Administrative Road Network.

The NRA allows for the use of class 1 e-bikes on trails where traditional bicycle use occurs, including administrative roads. Table 1B shows a comprehensive list of all administrative roads available in the existing trail network.

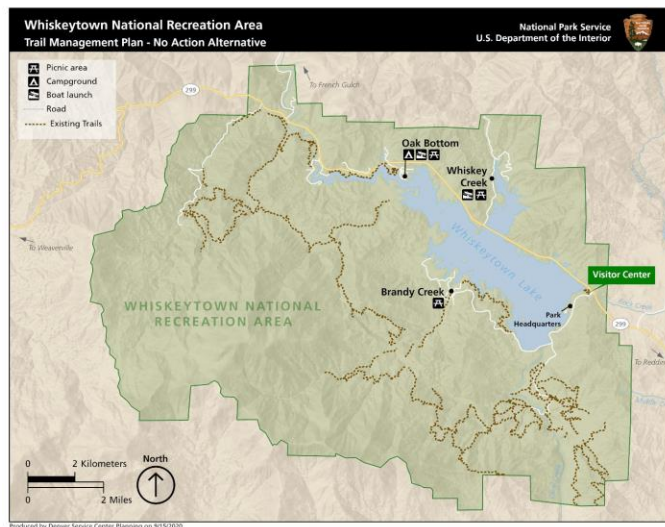
Table 1B: Existing Administrative Roads, and Distance

<u>Administrative Road Name</u>	<u>Length (miles)</u>
<u>Brandy Creek Spur Road (Administrative)</u>	<u>0.1</u>
<u>Carr Housing Area Road (Administrative)</u>	<u>0.3</u>
<u>Clear Creek Picnic Area Access Roads (Administrative)</u>	<u>0.3</u>
<u>Coggins Flat North Access Road (Administrative)</u>	<u>0.1</u>
<u>Crystal Creek Camp Access Road and Parking Areas (Administrative)</u>	<u>0.2</u>
<u>Crystal Creek Falls Road (Administrative)</u>	<u>0.4</u>
<u>Dog Gulch Road (Administrative)</u>	<u>0.4</u>
<u>East Beach Access Road (Administrative)</u>	<u>0.1</u>
<u>Grizzly Gulch South Spur Road (Administrative)</u>	<u>0.3</u>
<u>Grizzly Gulch North Spur Road (Administrative)</u>	<u>0.1</u>
<u>Merry Mountain Roads (Administrative)</u>	<u>0.6</u>
<u>Mexican Springs Road (Administrative)</u>	<u>0.2</u>

<u>Mt. Shasta Mine Loop Road (Administrative)</u>	<u>0.1</u>
<u>Monarch Mountain Road (Administrative)</u>	<u>0.6</u>
<u>New York Gulch Area Roads (Administrative)</u>	<u>1.5</u>
<u>PG&E Roads (Administrative)</u>	<u>14.0</u>
<u>Tower House Historic District Road/El Dorado Mine Road (Administrative)</u>	<u>0.5</u>
<u>Transfer Station Road (Administrative)</u>	<u>0.1</u>
<u>WAPA Roads (Administrative)</u>	<u>22.3</u>
<u>Total</u>	<u>42.2</u>

Chapter 2, Page 14:

(Replaced first image with second image to show more road connections.)





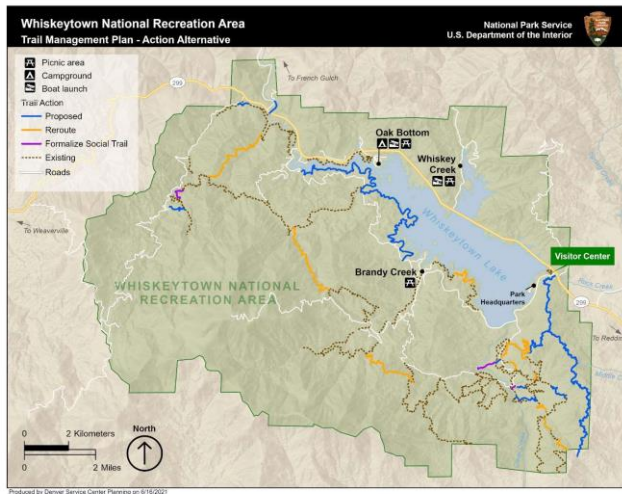
Chapter 2, Page 15: *Action Alternative – NPS Proposed Action and Preferred Alternative. Under the action alternative (NPS preferred alternative), 79.4 87 miles (approximately 13.4 17 additional miles compared to the no action) of total trail would be included in the trail system. Trash and pet waste receptacles would be installed at key local locations and trailheads.*

Chapter 2, Page 15: *Trail Construction: This alternative proposes approximately 32.82 miles of trail construction that includes new trails and rerouted sections of existing trail.*

Chapter 2, Page 15: *New Trails: This alternative would also establish a new trail along the Shasta Divide at the east side of the park. This trail, covering about 7 miles in the eastern portion of the park, would provide visitors with views of Mount Shasta and the Cascade Range. The trail would be designed to provide a potential new connection ~~connect~~ with the adjacent BLM trail network at Mule Mountain where mountain biking occurs, which would enhance enhancing the visitor use experience of bicyclists. This potential new connection to BLM trails would be established in a separate compliance process.*

Chapter 2, Page 16:

(Replaced first image with second image to show more road connections.)



Chapter 2, Page 16: *Trail Reroutes: Out of these 15.3 miles of trail, 13.7 miles of trail are being rerouted to more sustainable alignment and use.*

Chapter 2, Page 16: *Trails Restored to Natural Condition: In total, 5.13 miles of trail would be closed without a reroute. A mixture of hand tools and motorized equipment would be used to return the trails to natural conditions.*

Chapter 2, Page 17:

Table 2. New Trails Proposed in Action Alternative

Trail Name	Trail Class	Trail Use	Reroute	Length (Miles)
<u>Boulder Creek Trail</u>	<u>4</u>	<u>Multiuse</u>	<u>Yes</u>	<u>1.6</u>
<i>James K. Carr Trail Extension</i>	<i>3</i>	<i>Multiuse</i>		<i>.5</i>
<i>Camden Water Ditch Trail Extension</i>	<i>3</i>	<i>Multiuse</i>		<i>.3</i>
<i>Clear Creek Canal Trail</i>	<i>3</i>	<i>Multiuse</i>	Yes	<i>.4</i>

Trail Name	Trail Class	Trail Use	Reroute	Length (Miles)
<i>Clear Creek Picnic Trail</i>	5	<i>Multiuse</i>		.3
<i>Davis Gulch Trail</i>	4	<i>Pedestrian Only</i>	Yes	1.1
<i>East Boundary Vista Trail</i>	3	<i>Multiuse</i>		1.4
<i>Guardian Rock Equestrian Trail</i>	3	<i>Multiuse</i>		.3
<i>Horse Camp Trail</i>	3	<i>Multiuse</i>		.4
<i>Mill Creek Trail</i>	3	<i>Multiuse</i>	Yes	2.6
<i>Mount Shasta Mine Loop Trail</i>	3	<i>Multiuse</i>	Yes	2.7
<i>Mule Mountain Pass Trail</i>	3	<i>Multiuse</i>	Yes	.8
<i>Orofino Trail</i>	2	<i>Multiuse</i>		.3
<i>Papoose Pass Trail</i>	3	<i>Multiuse</i>	Yes	2.5
<i>Peltier Bridge Trail</i>	3	<i>Multiuse</i>		.6
<i>Prospect Trail</i>	3	<i>Multiuse</i>		.7
<i>Salt Gulch Trail</i>	3	<i>Multiuse</i>	Yes	2
<i>Shasta Divide Trail</i>	3	<i>Multiuse</i>		7
<i>Whiskeytown Lake Trail</i>	5	<i>Multiuse, No Equestrians</i>		8.3
Total				32.82

Descriptions of the proposed action alternative trails are listed below.

Boulder Creek Trail – This trail is a minor reroute of the existing Mill Creek Trail, renamed to connect with the existing Boulder Creek Trail.

Chapter 2, Page 18: *Shasta Divide Trail – This new 7-mile trail would provide a longer trail opportunity along the Shasta Divide ridge leading from the Whiskeytown Visitor Center to towards Mule Mountain. One portion of this trail would provide a potential connection to the Mule Mountain trail network on BLM land A portion of this trail would need to be constructed on land outside of the NPS boundary to connect to the Mule Mountain trail network, requiring coordination with the Bureau of Land Management. This potential new connection to BLM trails would be established in a separate compliance process.*

Chapter 2, Page 21: Mitigation Measures for Natural Resources

- Activities that increase erosion potential within the Lower Clear Creek watershed will be limited to May 1 to October 31, when the potential for rainfall events to transport sediment to surface waters is lowest.
- All work will cease among any trails near Clear Creek, and its tributaries during rain.
- No lights will be near Clear Creek, even for security purposes.

- Best Management Practices (BMPs) will be in place for the duration of the project to minimize or prevent sediment of other construction-related materials from entering the water. BMPs include installation of rock walls, rolling dips, slope breaks, silt fencing for any earthwork needed, erosion matting and wattles, and mulching to control exposed soil on slopes and ditches to limit sediment from reaching waterways. Any silt fencing or monofilament materials will be removed promptly at project completion. No plastic monofilament wattles will be used, only biodegradable materials.
- Installation of BMPs will occur only during dry periods. Prior to storm events, all construction activities shall cease and appropriate erosion control measures will be implemented. Prior to initiation of any waterside work, erosion control measures will be utilized throughout all phases of operation where silt and/or earthen fill threaten to enter waters of the U.S. and/ or state, limiting or preventing turbidity in the waterways of concern.
- New and rerouted trails will be installed at low grades and will be out-sloped.
- Removal of native vegetation adjacent to trails will be minimized, and removal of large trees will be avoided.
- Soil, silt, or other organic materials will not be placed, stockpiled, or stored where such materials could pass into surface water or surface water drainages during unexpected rain events.
- Hazardous materials will be stored in a location where there is no potential to enter any waterway or aquatic resource. All hazardous materials will be stored in secondary containment (e.g., by a prefabricated temporary containment mat, a temporary earthen berm, or other measure) and covered when rain is forecast or during wet weather.
- Any spills will be immediately contained and cleaned up (e.g., with absorbent materials or affected soil dug up and properly disposed of). If the spill occurs during rain, the impacted area will be covered to avoid runoff, and appropriate clean-up steps will be taken after precipitation has ceased. For spills of federal reportable quantities, the National Response Center will be notified.
- Refueling of vehicles and equipment will occur at least 100 feet away from waterways.
- Work is expected to take up to 10 years due to funding, and the NPS will send NMFS a report on project progress and expectations every 5 years.
- NPS will stay aware of ESA species status and needs during the project length and will reinstate consultation if any changes are made to ESA listed species in the action area.
- NPS is installing informative exhibits near Clear Creek about listed fish species.

Chapter 3, Page 28: *Likewise, the construction of 32.82 miles of new trail would result in the loss of soils and trailside vegetation in localized areas.*

Chapter 3, Page 28: *Federally listed fish species known to inhabit the park (including those the project would have the potential to impact) are the ~~Sacramento River spring-run Chinook salmon~~ Central Valley spring run Chinook salmon (*Oncorhynchus tshawytscha*) and the California Central Valley (Evolutionary Significant Unit) steelhead trout (*Oncorhynchus mykiss*). Both species are listed as "threatened" under Section 7 of the Endangered Species Act and Lower Clear Creek provides Critical Habitat for these salmonids. The removal of McCormick-Saeltzer Dam on Lower Clear Creek in the fall of 2000 has allowed these species access to the upper reaches of Lower Clear Creek and these anadromous fish are now using portions of Lower Clear Creek within Whiskeytown NRA for spawning. ~~No critical habitat has been~~*

designated for these species in the recreation area. Critical habitat was designated in September of 2005 for the listed species and includes Clear Creek up to the Whiskeytown dam (50 CFR 226.211). *Spring-run chinook salmon (which are also listed as threatened by the State of California) and steelhead trout only occur in Lower Clear Creek as Whiskeytown Dam effectively blocks them from accessing much of their historic spawning habitat. The following table depicts details for the current trails in the Lower Clear Creek Watershed, including their distance from the perennial creek and elevation above lower Clear Creek in meters (m) (Table 3a).*

Table 3a. Lower Clear Creek Watershed Trails

<u>Trail Name</u>	<u>Trail Type</u>	<u>Trail Length (miles)</u>	<u>Trail Status</u>	<u>Distance from perennial creek (m)</u>	<u>Elevation above lower Clear Creek (m)</u>
<u>Buck Hollow Trail</u>	<u>Multi-use</u>	<u>1</u>	<u>Current</u>	<u>800 m from Clear Creek</u>	<u>> 60 m</u>
<u>Clear Creek Canal Trail</u>	<u>Multi-use</u>	<u>4.8</u>	<u>Current**</u>	<u>Crosses Orofino Creek at one location</u>	<u>46 m</u>
<u>Guardian Rock Trail</u>	<u>Multi-use*</u>	<u>1</u>	<u>Current</u>	<u>60 m (except short creek access trail)</u>	<u>3 m at trailhead, but generally 18 m</u>
<u>Hydraulic Mine Trail</u>	<u>Multi-use</u>	<u>0.5</u>	<u>Current</u>	<u>10 m at Peltier Bridge Campground</u>	<u>4 m</u>
<u>Kanaka Peak Trail</u>	<u>Multi-use</u>	<u>3.3</u>	<u>Current</u>	<u>Crosses Paige Boulder Creek at one location</u>	<u>> 200 m</u>
<u>Ladybug Lane Trail</u>	<u>Pedestrian Only</u>	<u>0.3</u>	<u>Current</u>	<u>250 m from Paige Boulder Creek</u>	<u>> 35 m</u>
<u>Logging Camp Trail</u>	<u>Multi-use</u>	<u>1.25</u>	<u>Current</u>	<u>250 m from Clear Creek</u>	<u>20 m</u>
<u>Martha's Ditch Trail</u>	<u>Pedestrian Only</u>	<u>2.5</u>	<u>Current</u>	<u>Crosses Paige Boulder Creek at one location</u>	<u>> 8 m</u>
<u>Princess Ditch Trail</u>	<u>Multi-use</u>	<u>1.9</u>	<u>Current**</u>	<u>350 m from Clear Creek</u>	<u>> 90 m</u>
<u>Ridge Trail</u>	<u>Pedestrian Only</u>	<u>1.8</u>	<u>Current</u>	<u>125 m from Clear Creek</u>	<u>> 8 m</u>

*Creek Access portion of trail only used by hikers and not suitable for mountain biking or equestrian use. Approximately 400 meters is paved and ADA accessible.

**Trail follows an abandoned water ditch.

Chapter 3, Page 33: Action Alternative – *NPS Proposed Action and Preferred Alternative. The action alternative's proposal for new trails, reroutes, and other improvements would result in varying levels of sediments potentially transported into Lower Clear Creek and other drainages throughout the park (Weatherbee, NPS 2020d). This would result in increased turbidity, which would be a short-term, adverse impact on salmonid habitat and fish spawning in park drainages. The following map depicts the proposed changes to the trail system in the Lower Clear Creek Watershed (Figure 3a). The following table depicts details for the current trails in the Lower Clear Creek Watershed, including their distance from the perennial creek and elevation above lower Clear Creek in meters (m) (Table 4a).*

Figure 3a

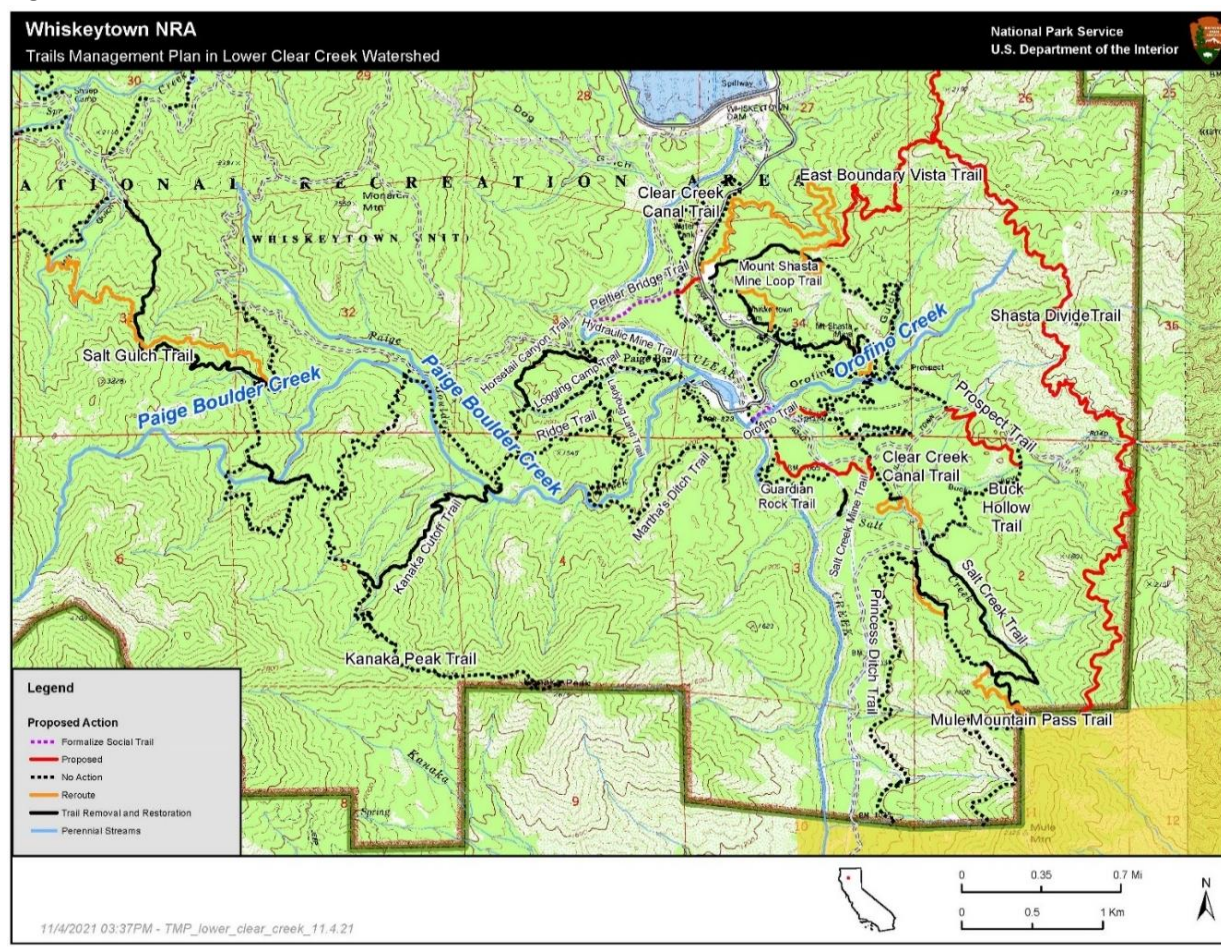


Table 4a. Lower Clear Creek Watershed Trails

Trail Name	Trail Type	Trail Length (miles)	Trail Status	Distance from perennial creek (m)	Elevation above lower Clear Creek (m)
Prospect Trail	Multi-use	0.7	Current with proposed new section	Current trail crosses Orofino Creek at one location	50 m
Salt Gulch Trail	Multi-use	2	Current with proposed reroute	Currently 300 m from Paige Boulder Creek	390 m
Mt. Shasta Mine Loop Trail	Multi-use	3.9	Current with proposed reroutes (2.7 mi.)	One section is currently 5 m from Orofino Creek	> 62 m
Mule Mountain Pass Trail	Multi-use	4.25	Current with proposed reroutes (0.8 mi.)	Currently 740 m from Clear Creek	> 65 m
Clear Creek Canal Trail (new)	Multi-use	0.4	Proposed new section	600 m from Clear Creek	60 m
East Boundary Vista Trail	Multi-use	1.4	Proposed new trail	> 1000 m from Clear Creek and Orofino Creek	> 170 m

<u>Guardian Rock Equestrian Trail</u>	<u>Multi-use</u>	<u>0.3</u>	<u>Proposed new trail*</u>	<u>60 m from Clear Creek</u>	<u>18 m</u>
<u>Shasta Divide Trail</u>	<u>Multi-use</u>	<u>7</u>	<u>Proposed new trail</u>	<u>>100 m from headwaters of Orofino Creek **</u>	<u>>300 m</u>
<u>Horsetail Canyon Trail</u>	<u>Multi-use</u>	<u>0.6</u>	<u>Proposed removal & restoration</u>	<u>100 m from Clear Creek</u>	<u>> 8 m</u>
<u>Kanaka Cutoff Trail</u>	<u>Multi-use</u>	<u>1.1</u>	<u>Proposed removal & restoration</u>	<u>Crosses Paique Boulder Creek at one location</u>	<u>120 m</u>
<u>Salt Creek Mine Trail</u>	<u>Multi-use</u>	<u>0.1</u>	<u>Proposed removal & restoration</u>	<u>250 m from Clear Creek</u>	<u>25 m</u>
<u>Salt Creek Trail</u>	<u>Multi-use</u>	<u>1</u>	<u>Proposed removal & restoration</u>	<u>800 m from Clear Creek</u>	<u>40 m</u>
<u>Orofino Trail</u>	<u>Multi-use</u>	<u>0.3</u>	<u>Social trail to be formalized</u>	<u>5 m from Orofino Creek</u>	<u>> 3 m</u>
<u>Peltier Bridge Trail</u>	<u>Multi-use</u>	<u>0.6</u>	<u>Social trail to be formalized</u>	<u>680m to 40 m (at Peltier Bridge)</u>	<u>7 m near Peltier Bridge</u>

*Proposed new section of Guardian Rock trail, that would divert horseback riders off the existing trail

**Exact location for new trail not yet determined.

Chapter 3, Page 35: As proposed in the action alternative, the 32.82 miles of new trails constructed would direct park visitors near areas in Whiskeytown that contain known archeological resources.

Chapter 3, Page 40: This trail monitoring program included 65 of the 70 miles of ~~total~~ trail in the park.

Chapter 3, Page 43: The overall trail network includes 6670 miles of trails. Trails at Whiskeytown NRA range from .25 miles to 7.25 miles in length, with elevation changes ranging from 50 feet to 4,356 feet.

Chapter 3, Page 43: Bicycle use, including the use of Class 1 ~~and Class 2~~ e-bikes, occurs on all multiuse trails at Whiskeytown, totaling ~~at 36 trails and~~ 46.270 miles of trails.

Chapter 3, Page 46: Visitor Use and Experience Impacts. Boulder Creek Trail – This reroute would enhance the visitors’ experience through connecting this reroute of the existing Mill Creek Trail to connect with the existing Boulder Creek Trail.

Chapter 4, Page 53: The National Park Service has initiated consultation with the National Marine Fisheries Service on the ~~Sacramento River spring-run chinook salmon~~ Central Valley spring run Chinook salmon (*Oncorhynchus tshawytscha*) and the California Central Valley (Evolutionary Significant Unit) steelhead trout (*Oncorhynchus mykiss*). Both species are protected under the ESA and are federally listed as “threatened.”

Appendix C, Page C-3: This trail monitoring program included 65 of the 70 miles of ~~total~~ trail in the park.

Appendix C. Response to Comments

Sixty-seven comments were received during the public review period. A substantive comment is defined by NPS Director's Order 12 (DO-12) as one that does one or more of the following:

- question, with reasonable basis, the accuracy of information in the environmental analysis
- question, with reasonable basis, the adequacy of the environmental analysis
- present reasonable alternatives other than those presented in the environmental analysis
- cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. The following text summarizes the substantive comments received during the comment period and is organized into concern statements and responses. All page numbers contained herein refer to the Whiskeytown National Recreation Area Trails Management Plan Environmental Assessment. Given the extent of substantive comments and substantial number of modifications to the plan/EA, the NPS is issuing a revised EA for public review. Public comments will not be received on the revised EA. The revised EA reflects updated trail mileages, additional best management practices, and minor updates based on bike policies (including details on allowable bike use on administrative roads).

- 1. Concern Statement:** Multiple commenters urged for the inclusion of a long-distance high elevation trail in the back country, such as connecting the upper section of the Brandy Creek watershed with Coggins Park or Whiskeytown Falls to provide a variety of visitor user groups opportunities for larger ascents and descents, camping opportunities, and views of local mountain peaks and valleys.

NPS Response: The concept of a long-distance high elevation trail was dismissed for inclusion in this plan for a variety of reasons including difficulty to maintain the trail, topographic limitations from the grade, likely significant impacts to resources (i.e., impacts to rare plants, increased erosion from decomposed granite soils, and impacts to cultural resources). Post-Carr fire considerations provide further safety concerns for a high-elevation trail in this area. The park acknowledges the public's desire for a high elevation experience and will revisit this potential high elevation trail opportunity in a separate planning process.

- 2. Concern Statement:** One commenter suggested including an additional multiuse trail from Whiskeytown Dam to Highway 299 to provide a connection for bicyclists without riding on JF Kennedy Memorial Rd.

NPS Response: The park made previous efforts to add a bike lane from the Whiskeytown Dam to Highway 299 and this was deemed unfeasible due to legal requirements for safe roadway passage.

3. **Concern Statement:** One commenter suggested including an additional multiuse trail from Southfork Lookout Road towards Shasta to avoid riding on Highway 299.

NPS Response: Whiskeytown staff agree that a trail from Shasta to Southfork Road would be a good, safe alternative to riding on Highway 299, but it is out of the scope of this plan. The NPS is committed to continue working with partners to support increased recreation infrastructure.

4. **Concern Statement:** One commenter suggested including an additional multiuse trail traveling along the southwest boundary of the park, utilizing old fire roads to support opportunities for gravel biking.

NPS Response: Construction of a gravel biking road on the southwest boundary would be infeasible given the steep grades, lack of old fire roads, and lack of access and ability to haul gravel to this area. Whiskeytown has many backcountry graveled roads such as Peltier Valley and Brandy Creek which can provide a gravel bike experience.

5. **Concern Statement:** Commenters stated their desire for a trail open only to mountain bikers to help alleviate user conflicts in the park.

NPS Response: The park will evaluate the possibility of segregating trail uses in some areas. Although options are currently being explored, no final decisions will be made at this time. In the interim, trail usage patterns will be assessed, and some adjustments may occur in the future if there are conflicts between user groups.

6. **Concern Statement:** One commenter suggested including an additional pedestrian only lakeside trail from Whiskey Creek beach parking heading southeast along the shore toward Highway 299.

NPS Response: The park is exploring possible routes for a pedestrian trail on the west side of Whiskey Creek arm, however other issues would also need to be addressed, including available parking and associated conflicts with boaters.

7. **Concern Statement:** One commenter suggested including an additional trail from Brandy Creek RV road northwest to the marina dock.

NPS Response: The park is evaluating the possibility of formalizing some of the existing short social trail routes to the lake.

8. **Concern Statement:** Commenters suggested maintaining the current alignment of the Davis Gulch Trail with minor adjustments for erosion to allow hikers to continue enjoying the plant diversity on the current trail alignment. Commenters do not want the current alignment of the Davis Gulch trail to be closed. One commenter suggested adding a switchback on the first steep hill and a few berms to address erosion issues.

NPS Response: Approximately two thirds of the existing trail alignment will be maintained. After evaluating the conditions of the current alignment on the Davis Gulch trail, the erosion in one third of the trail is unsustainable and will therefore be rerouted. The NPS is confident that opportunities for visitors to experience plant diversity will be maintained along the rerouted trail alignment. The park is committed to inviting interested parties in the final design planning, with the goal of maintaining the same biological values of the existing trail.

9. **Concern Statement:** One commenter expressed concern about the trail construction methods proposing an average grade of up to 12%. Commenters expressed that 12% grade is too steep to climb on a bike, does not optimally utilize the topographic terrain, and is difficult to maintain.

NPS Response: The NPS agrees that 12% is steep for trail construction and the preferred goal is 5 to 10% grade. However, given the steepness of the Whiskeytown backcountry, it was established that 12% grade may be needed for short distances in order to traverse areas or avoid obstacles.

10. **Concern Statement:** Two commenters expressed concern about the trail construction methods proposing a width between 24 and 48 inches. Commenters would like to see more single-track trails to reduce the impacts to the land and for construction to avoid the use of a Sweco trail dozer.

NPS Response: A minimum of forty-eight inches width for a multi-purpose trail is a standard established by NPS at Whiskeytown NRA for equestrian use. Horses are much larger than bikes and pedestrians and require additional space for safe riding experience. Additionally, we will brush the sides of the trail up 2-feet and trim the canopy to 10-feet to accommodate equestrian use. The NPS uses a trail dozer when conditions allow and not all trails have been constructed with a trail dozer. In general, Whiskeytown prefers to use a trail dozer in lower gradient conditions which tend to be in the lower elevations. An example of this would include the Priciness Ditch Trail which was constructed using a trail dozer. Where slope gradients are steeper, the park chooses to utilize hand crews and an example of this would be the Papoose Gulch Trail which was constructed mostly by hand. The Park has learned some lessons in regard to the trail dozer operation and application but feels they have been successful when utilized in the lower grade conditions.

11. **Concern Statement:** One commenter expressed concern about the trail construction methods of sloping and would prefer for inside turns on mountain bike trails to be outsloped and for outside turns to be insloped.

NPS Response: This plan proposes most trail construction for multi-use which include equestrian and pedestrian use along with bike use. The park installs 48" wide trails to facilitate

equestrian use. The park will utilize outsloping of the trail surface to reduce erosion, a proven method and utilized on our newly constructed and restored trails. Inboard ditches and insloped trails require more frequent maintenance and are subject to higher rates of erosion or failure. The park does not have unlimited resources to maintain trails and relies upon proven methods to reduce erosion and consequently maintenance.

- 12. Concern Statement:** One commenter would like to see grade reversals and other trail construction options instead of using water bars.

NPS Response: Whiskeytown trail construction and restoration will utilize many different methods to achieve its goals of providing a quality trail experience while reducing erosion and grade reversal can be one of those methods. Water bars are not a preferred erosion control method and have been shown to be ineffective in the long-term. If structures are needed to drain the trail, the preferred method is to construct erosion control barriers, similar to speed bumps. An example of this would be the Ridge and Logging Camp trails. The park will outslope new trails and rerouted trails and utilize this and grade reduction as the primary means to reduce erosion. Other techniques will be utilized as needed.

- 13. Concern Statement:** One commenter suggested hiring a professional trail building consultant to review the current trail plan and provide guidance on executing the plan.

NPS Response: The majority of trails at Whiskeytown are old logging roads that are adapted for trail use and has resulted in a trail system that is over steepened and unsustainable. Whiskeytown is utilizing this plan to make our trail system a more enjoyable experience for all user groups and agrees that a trail is not just a route to connect Point A to Point B, but is an experience in itself. Currently Whiskeytown NRA has two trail building professionals on staff, access to NPS trail design and construction consultants, and planning documents for guidance in constructing sustainable trails, and a nation-wide network of conservation specialists. However, the park does not want to work in a vacuum, and we will work with our public and private cooperators to provide a quality trail experience while conserving natural and cultural resources.

- 14. Concern Statement:** One commenter suggested constructing bridges across substantial stream crossings along all new or rerouted trails to increase the park's resiliency to wildfires and stream flooding in the future.

NPS Response: In the past 15 years Whiskeytown has installed several bridges over substantial stream crossings including Brandy, Crystal, and Mill Creeks. Wooden construction was utilized for these trail bridges and boulders used for the footings and these techniques were used to blend the structure with the environment. Several of these bridges were lost in the fire and

Whiskeytown NRA will explore the idea of bridge construction using more “survivable” materials such as stone and footings made of concrete.

- 15. Concern Statement:** One commenter noted the presence of the California rare plant Shasta Maidenhair Fern (*Adiantum shastense*) in the areas affected by this plan.

NPS Response: The Shasta Maidenhair Fern was also recently discovered in another area of the park. Prior to any trail construction, plant surveys would be conducted by qualified rare plant biologists. If any of these rare plants are found during surveying, additional mitigation would occur.

- 16. Concern Statement:** One commenter suggested considering installing trash receptacles located at key locations and with regular maintenance to reduce impacts of trash on the natural environment as a part of this plan.

NPS Response: Trash and pet waste receptacles at key local locations and trailheads are now included as management strategies in this EA, however visitors will still need to pack out their trash from backcountry trail locations.

- 17. Concern Statement:** One commenter expressed a desire for more challenging trails with longer mileage that are pedestrian friendly.

NPS Response: As stated in the EA, there are currently four trails open to pedestrians only and one new trail will be constructed to be open to pedestrians only (pg 43, pg 47). The addition of multiuse trails throughout the park will help spread out user types to increase the safety of all user groups. The addition of new and rerouted trails in the preferred alternative will provide visitors opportunities for longer hikes, such as the 7-mile Shasta Divide Trail and the 8.3-mile Whiskeytown Lake trail (pg 17). The newly constructed East Boundary Vista Trail and Shasta Divide Trail will provide visitors with opportunities for elevation change to ensure opportunities for challenging terrain.

- 18. Concern Statement:** Commenters are concerned about the safety of Class 2 e-bikes on unpaved trails. Commenters suggest allowing Class 2 e-bikes on paved roads only, and only allowing class 1 e-bikes on unpaved trails.

NPS Response: The NPS agrees that class 2 e-bikes should not be allowed on unpaved trails. Class 2 e-bikes will be permitted only on paved roads that are already open to motorized use. The EA has been updated accordingly.

- 19. Concern Statement:** Commenters stated their interest in having a protected bike lane inside the national recreation area, particularly from the Visitors Center to the Whiskeytown Lake Trail.

NPS Response: Roads within the park boundary are not owned and operated by the National Park Service. While NPS would like to support the addition of bike lanes in the park, this is out of scope for this project.

20. Concern Statement: One commenter stated that an additional alternative needs to be analyzed in order to adhere with the NEPA process.

NPS Response: As per the Council on Environmental Quality (NPS NEPA Handbook, p. 54), "There is no minimum number of alternatives that must be developed when preparing an EA. In some cases, the range of alternatives for an EA can be two—the proposal and the No-Action Alternative." Based on prior public comment and plan objectives, only one action alternative was determined to be needed.